FLORIDA PUBLIC SERVICE COMMISSION Capital Circle Office Center • 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

MEMORANDUM

RECEIVED

April 30, 1998

APR 3 0, 1998 10:30 FPSC - Records/Reporting

TO:

DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM:

DIVISION OF LEGAL SERVICES (BEDELL) CB (MC) DIVISION OF COMMUNICATIONS (LEWIS) CKL

RE:

DOCKET NO. 980552-TI - PROPOSED REFUND OF OVERCHARGES BY OPTICOM, A DIVISION OF ONE CALL COMMUNICATIONS, INC.

AGENDA:

05-12-98 -AGENDA - PAA - INTERESTED PERSONS MAY

PARTICIPATE

CRITICAL DATES:

NONE

SPECIAL INSTRUCTIONS: S:\PSC\CMU\WP\ 980552TI.RCM

#### CASE BACKGROUND

On January 13, 1997, staff notified One Call Communications, Inc. (One Call) that it had been selected as one of the Inter-Exchange Companies (IXCs) to be evaluated as part of the Commission's normal service quality evaluation. Staff also notified One Call it must provide certain billing information as part of the evaluation. (Attachment 1, pages 4 through 6). Staff conducted toll timing and billing tests on January 22nd and January 30th, 1997.

Staff reviewed the results of the testing and discovered an overtiming problem in One Call's billing. On September 3, 1997 staff issued the Interexchange Service Evaluation Report and requested an outline of corrective action taken to resolve the overtiming problem discovered during the evaluation (Attachment 2, pages 7 through 22). One Call responded on September 22, 1997, explaining the corrective action made to its billing system (Attachment 3, page 23).

On November 21, 1997, staff requested further information concerning the overcharges (Attachment 4, page 24 through 25). On December 15,1997, One Call requested an extension until January, 1998, to answer staff's questions (Attachment 5, page 26). One Call

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DOCKET NO. 980552-TI DATE: April 30, 1998

did not respond in January and staff again requested a response on March 3, 1998 (Attachment 6, page 27 through 28).

Thereafter, One Call requested and attended a meeting with staff on March 11, 1998 to discuss One Call's timing and billing practices. On March 23, 1998 One Call outlined its plan to refund the excess revenues gained by the inadvertent overtiming (Attachment 7, page 29 through 31). One Call estimates that \$7,500 is the amount to be refunded. One Call wishes to refund the revenue by a rate reduction for its consumers for a period of six months or until the \$7,500 is refunded.

#### DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve One Call Communications proposal to refund \$7,500 in overcharges through a prospective rate reduction lasting approximately six months?

<u>RECOMMENDATION</u>: Yes. The Commission should approve One Call Communications' proposal to refund the \$7,500 by the rate reduction method for a period of six months or until the \$7,500 is refunded. (Lewis)

STAFF ANALYSIS: In reviewing the bills from the evaluation, staff determined that One Call was overtiming fifty five (55) percent of our test calls, which are purposely focused on the beginning and ending of billing increments, due to its rounding methodology. One Call had made the adjustment after a previous evaluation revealed that calls were being under timed. One Call has taken corrective measures to prevent this problem from occurring in the future.

Since One Call's primary customer base is pay phone consumers, it is highly unlikely that One Call would be able to make direct reimbursement to these customers. One Call can only identify the destination of the calls but not the identity of the caller. Therefore, One Call suggested and staff agrees that the rate reduction method is sufficient to make Florida consumers as a group, whole. Staff notes that One Call has been attentive in addressing the Commission's concerns on this matter and in the past. Therefore, staff is not recommending a show cause proceeding at this time. (Lewis)

ISSUE 2: Should this docket be closed?

<u>RECOMMENDATION</u>: No. This docket should remain open pending resolution of the refund process. One Call should prepare a report to the Commission every thirty days until the rebate is complete.

DOCKET NO. 980552-TI DATE: April 30, 1998

If, however, One Call Communications fails to refund the additional revenue, staff will recommend that the Commission issue an order to Show Cause why One Call should not be fined for overcharging Florida consumers. (Bedell)

STAFF ANALYSIS: If the Commission approves staff's recommendation in Issue 1, One Call will have 180 days from the issuance of the Commission's order to provide documentation of the refund. If, however, One Call Communications fails to refund the additional revenue, staff will recommend that the Commission issue an order to Show Cause why One Call should not be fined for overcharging Florida consumers. This docket, accordingly, should remain open pending resolution of the refund process. (Bedell)

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
DIANE K. KIESLING
JOE GARCIA



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (904) 413-6600

# Public Service Commission

January 13, 1997

RECEIVED TAMPA DISTRICT

Ms. Deborah Barrett
Opticom, a Division of One Call Communications, Inc.
801 Congressional Blvd., Suite 100
Carmel, IN 46032

JAN 3 1 1997

FLORIDA PUBLIC SERVICE COMMISSION

Dear Ms. Barrett:

Staff from the Bureau of Service Evaluation are scheduled to evaluate your company in the following exchanges: (Tampa exchange). The central offices and numbers that are presubscribed to your company are shown on the enclosed attachment. This evaluation will be conducted during the period of (1-20-97 thru 2-14-97) pursuant to Chapter 25-21.26, to execute a comprehensive telephone service evaluation to assure the availability and provisioning of safe, efficient and sufficient communications throughout the state. Our evaluation program applies not only to local exchange companies but to interexchange companies as well.

A significant part of this evaluation will be the generation of test calls from selected central offices in the exchanges to be evaluated to all NXX codes throughout the State of Florida. The purpose of these calls is to determine the following:

1) The call completion rate.

2) Timing accuracy to determine if the call was properly timed.

3) Whether the call was billed according to the tariff.

4) The rating accuracy to determine if the proper amount was billed for the units generated.

5) Whether the transmission parameters were met.

Since we test both 1+ and 0+ billing, please provide a calling card and PIN number for the 0+ calls. Regular bills for our test calls should be sent to:

The Florida Public Service Commission Division of Communications 9950 Princess Palm Avenue Suite 310 Tampa, Florida 33619-8370 ATTN: Chet Wade

Page 4

Ms. Barrett Page 2 January 13, 1997

The Florida Public Service Commission account should be established the same as your regular customers. Since this is a part of the Commission's normal surveillance activity, no reimbursement will be made for our test calls. Therefore, proper disposition should be made of these charges and the accounts closed within sixty (60) days or two (2) complete billing cycles after our review is completed.

Please respond with the tariff section(s) and paragraphs that you will use to bill our test calls.

Should you have any questions, please feel free to contact Chet Wade (813) 744-6636 or me at (904) 413-6570.

Sincerely,

Don McDonald

U.S./Comm. Engineer Supervisor Bureau of Service Evaluation

c: Alan Taylor Chet Wade Attachment to One Call Communications DBA Opticom letter

Test number for central office PIG'd to One Call Communications DBA Opticom

Pinecrest 813-737-1863

### State of Florida

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
DIANE K. KIESLING
JOE GARCIA



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (904) 413-6600

## Public Service Commission

September 3, 1997

Ms. Deborah Barrett
Vice President, Regulatory
Opticom, a Division of One Call Communications, Inc.
801 Congressional Boulevard, Suite 100
Carmel, Indiana 46032

Dear Ms. Barrett:

The Florida Public Service Commission evaluated the quality of service from access lines presubscribed to your company during a comprehensive telephone service evaluation in the GTE Plant City exchange from January 21 thru February 17, 1997. In addition to measuring call completions, a series of test calls were generated to measure the timing of toll calls for billing purposes. These tests require that our calls be precisely timed to ensure that the elapsed times are the same for each carrier's series of calls.

To evaluate the accuracy of each network, all test calls are completed between our computerized timing testers. These testers use data signals to record connect time, to measure and record the call duration, and simultaneously disconnect and record the disconnect time. Our procedure accurately measures conversation time. The system clock in each tester is synchronized with the National Bureau of Standards' time. Normally, three calls are completed at each of the following 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 our testers for origination and duration time to develop our timing accuracy summary. While the accuracy of our tests can be measured in hundredths of a second, we allow the company a tolerance of + or - one second. We then compare the results with your tariff to ascertain that the bill rendered for our calls complies with the billing parameters contained in your tariff. Staff also analyzes the bill to determine if the call was rated correctly and that the proper dollar amounts were billed for the billing units that were generated. Our test results are enclosed for your review.

Where timing, tariff, or rating discrepancies were discovered, copies of our work sheets

Ms. Barrett September 3, 1997 Page 2

are enclosed. Where rules or standards are not being satisfied, we request that you respond within thirty (30) days from the date of this letter, outlining the corrective actions taken. No response is required for categories meeting the rules or standards. Our test results show a timing accuracy problem with both the 0+ and 1+ services.

Should you have any questions please feel free to contact Clayton Lewis at (850) 413-6578 or FAX (850) 413-6579.

Don McDonald

U.S./Comm. Engineer Supervisor Bureau of Service Evaluation

#### Enclosures

cc: Alan Taylor

Clayton Lewis
File: GTE/IXC Eval-97

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ONE CALL COMME CATIONS, INC. d/b/a OPTICON, A DIVISION OF ONE CALL COMMUNICATIONS, INC.

> TENTE PSVISED SEEET 28.2 CANCELS WINTE REVISED SHEET 28.2

# SECTION 3 - DESCRIPTION OF SERVICE

# 3.5 Service Offerings (Continued)

- 3.5.10 Rate One is a service whereby subscribers originate calls in areas with Equal Access capabilities serviced by Company by dialing to Company's switch through Equal Access dialing procedures: 1+ Disling/FGD (1000X). There is no installation fee or monthly charge for the Rate One service. Calls are billed in one (1) minute increments with a one (1) minute minimum.
- 3.5.11 Tier One is a basic MTS service for customers whose monthly long distance usage exceeds \$1000. There is no installation or monthly charge for Tier One service. Calls are billed in eighteen (18) second increments with a thirty (30)
- 3.5.12 FPTA is a 1+ service for aggregator locations who choose Company as their operator services provider. There is no installation or monthly fee for FPTA service. Calls are billed in eighteen (18) second increments with a thirty (30)
- 3.5.13 Alternative is a basic MTS service designed for business customers. There is no installation fee or monthly charge for Alternative. Calls are billed in six (6) second increments with an eighteen (18) second minimum.
- 3.5.14 Hospitality is a basic MTS service designed for hospitality customers, such as hotels/motels and condominiums, whose average monthly long distance usage exceeds \$3500. There is no installation fee or monthly charge for Hospitality service. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.15 Alliance is a service whereby residential subscribers originate calls in areas with Equal Access capabilities serviced by Company by dialing to Company's switch through Equal Access dialing procedures: 1+ Dialing/FGD (10XXX). There is no installation fee or monthly charge for Alliance. Calls are billed in six (6) second increments with

ISSUED:

EFFECTIVE: JUL 2 3 1996

ONE CALL COMMUNICATIONS, INC. d/b/a OPTICOM, A DIVISION OF ONE CALL COMMUNICATIONS, INC.

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### SECTION 4-RATES

4.14 PPTA

Day Evening Wight \$ .1200 .1200 .1200

4.15 Alternative

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DAY EVENING NIGHT \$ .1550 .1550 .1550

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Company: ONE CALL COMM (OFTIGM) Product: TANVEL SERVICE

Call Type: \_\_DDD 1+ \_\_Calling Card

Calling Card Surcharge: -50

Originating Exchange: Plant City

Terminating Exchange: TAU AMASSET

Timing Increment: 656C

Billing Increments:

Mileage: 21/

Tarill Rol: 4.7. / st-35

Tariff Rof: 3.5.3

Tariff Baf: 4, 4. /

First Increment (F. INCR) - /miN-.25

Additional Increments (ADD.INCR) - 65EC .025

Tot. Nins.	Rate F.INCR	ADD. INCR	TOE ADD. INCR	Base Cost	Tot Cost	Amt. Billed
+ 3.2.	,25	.025	22 X.025	1.30	1.30	1.30
3.1	.75	,075	21 x .025	1.275	1.28	1.28
3	.25	.175	20 Y 025	1.25	1.25	1.25
2.1	.75	.175	11 × .025	1.025	1.03	1.03
2	.75	.025	10 x.025	1.00	1.00	1.00
1.1	.75	. 025	.025	.775	.78	.78
1	.75			.25	.75	.75
1.2	.25	1025	ZX.025	.80	. 80	180
					+	
		The harmony				

#### Billing Analysis Timed Billed Rated Over Under 54 Correctly 54

Total Calls

54

ONE CALL COMMUNICATIONS, INC. d/b/a OPTICOM, A DIVISION OF ONE CALL CUMMUNICATIONS, INC.

CANCELS FOURTEENTE REVISED SHEET 28.1

# SECTION 3 - DESCRIPTION OF SERVICE

## 3.5 Service Offerings (Continued)

- 3.5.3 Travel Service allows customers to place long distance calls from locations other than their presubscribed telephone. Access to One Call's Network is gained by disling an 800/888 number. Two offerings exist under Travel Service: Travel America and Protocall Ambassador. Calls are billed in Six (6) second increments with a one (1) minute minimum. Cards are issued at no charge to the subscriber.
- 3.5.4 800 Alternative is a product whereby business subscribers receive incoming calls using switched access. There is a \$5.00 monthly minimum for 800 Alternative. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.5 Mational 800 is product whereby business subscribers receive incoming calls using switched access. There is a \$5.00 monthly minimum for Mational 800. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.6 Ecse Link 800 is a product whereby residential subscribers receive incoming calls using switched access. There is a \$5.00 monthly minimum for Home Link 800. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.7 Hospitality 800 is an inbound 800/888 service designed for hospitality customers, such as hotel/motels and condominiums. There is a \$5.00 monthly minimum for Hospitality 800. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.8 Ultra 800 is an inbound 800/888 service designed for business subscribers. There is a monthly minimum billing of \$5.00. Calls are billed in six (6) second increments with a thirty (30) second minimum.
- 3.5.9 Target 800 is an inbound 800/888 service designed for hospitality customers, such as hotels/motels and condominiums. There is a \$5.00 monthly minimum for Target 800. Calls are billed in six (6) second increments with an eighteen (18) second minimum.

ISSUED:

EFFECTIVE: JUL 23 1996

ONE CALL COMMONICATIONS, INC. d/b/a OPTICOM, A DIVISION OF ONE CALL COMMUNICATIONS, INC.

> SEVENTE REVISED SHEET 35 CANCELS SIXTH REVISED SHEET 35

## SECTION 4-RATES

## 4.4 Travel Service

4.4.1 <u>Travel America</u>

Day \$ .2500

Evening \$ .2100

Night \$ .1800

Operator Surcharge:

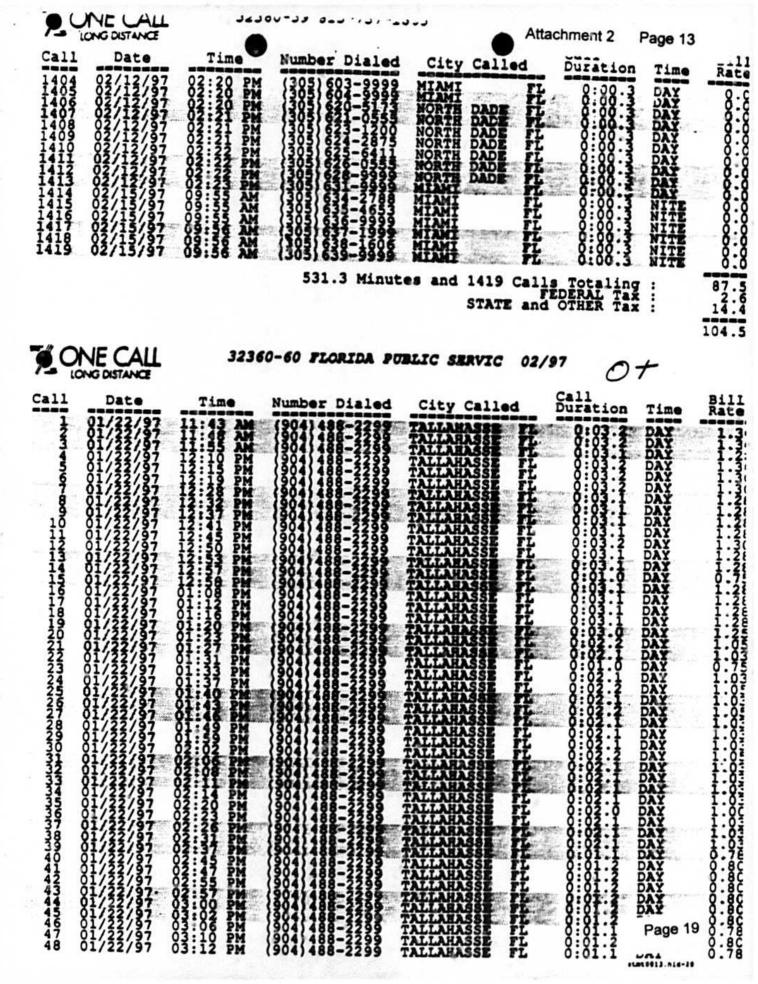
\$ 0.50 per call

4.4.2 Protocall Ambassador
Day \$ .3500
Evening \$ .3500
Night \$ .3500

D N

ISSUED:

EFFECTIVE: MAY 27 1995



TIMING, BILLING, & RATING RECONCILIATION PAGE \_ OF \_ COMPANY GTE FLORIDA HNECKEST LOCATION 1-22-97 DATE BILLING STORE 8/3-737-1863 OPTICOM OUT CALLERYICE CARRIER CALLERS CARD NO. 70466 30 BYALBAROR CHET WATER VERLIFIED ST Lew. DETRAIATA PSC IEG PARTY TIME STATE PARCE SEC HIM HIM PANCE TIMES ACCT BILLIS BATTER HETH COR THED OVE COR THE AME COR THED OVE E.T. 100.0 WE 11:47:02 61/22/97 12 3.1 1.30 104 468 2299 E.T. 183.0 SE 11:St:23 01/22/97 3.1 12 × V 1.30 104 469 2259 3 E.T. 183.0 882 11:33:22 01/22/97 3.1 3.1 28 104 460 2290 E.T. 182.0 ME 12:14:07 01/22/97 × 182 3.1. 130 904 400 2299 5 3.1 E.T. 182.0 ME 12:18:27 01/22/97 × .50 104 468 2291 E.T. 182.0 MEC 12:23:20 01/22/97 3.1 X 1.90 304 468 2239 7 E.T. 181.0 ME 12:31:40 01/22/97 V 1.77 964 488 229 181 E.T. 181.0 SEC 12:38:56 01/22/97 125 994 469 229 19.0 E.T. 181.0 SEC 12:40:20 01/22/97 1:7 104 480 2219 E.T. 180.0 ME L\$144.50 01/22/97 194 400 2250 100 180 32 C.T. 180.0 SEC 121404 01/22/97 1.20 994 488 2299 3/2 8.1 100 E.T. 180.0 ME 12:Sh 3 41/22/17 v 1.50 104 408 229 3.0 × E.T. 179.0 SE 12:57:21 01/22/97 v 128 194 468 2299 12:58:15 01/22/97 104 400 2250 179 14 3/ 5.0 E.T. 179.0 ME 13:02:16 01/22/97 1.22 U 994 469 2299 3.0 31 179 C.T. 179.0 WE 13:11:40 61/22/97 1.28 194 468 2255 31 5.0 × 1.28 E.T. 178.0 SEC 13:15:57 01/22/97 94 40 2299 3/ 1 50 E.T. 170.0 ME 13:19:49 01/22/97 , zt 194 489 229 18 30 3.0 E.T. 170.0 ME 13:23:27 01/22/97 1. Z S 994 400 2291 123 7.Z Z. | × 1.95 V E.T. 123.0 SSC 13:26:14 01/22/97 904 403 2259 20 21 2.1 V E.T. 128.0 SE 13:29:27 01/22/97 1.0 104 400 2250 E.T. 004.1 ME 13:22:22 01/22/97 784 480 2250 01 2.1 7.1 V 1.03 E.T. 123.0 WE 13:38:38 61/22/97 104 408 2250 72 V Z 21 7.1 V E.T. 122.0 SEE 13:39:40 01/22/97 904 468 2299 E.T. 122.0 882 13:42:35 01/22/97 79 122 Z. 1 2.2 V 1.45 104 400 225 V 74 22 2.1 Z. / / ~ E.T. 122.0 SE 13:49:55 01/22/57 25 994 468 225 2.1/20 V Z. Z 121 V E.T. 121.0 WE 13:40:47 61/22/97 2.1/20 904 408 2299 76 2,1 v 19= E.T. 121.0 SEC 13:51:41 01/22/57 2.1/20 104 488 229 77 V 121 v 1.03 E.T. 121.0 SEE 14:02:11 01/22/57 2 1/20 104 489 2259 .,5 75 120 2.1 Q:\FORMS\BILLING. ING

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September 22, 1997



CMU

Don McDonald
Bureau of Service Evaluation
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee. FL 32399-0850

2EP 2 5 1997

RECEIVED

Dear Mr. McDonald:

This letter is in response to the comprehensive telephone service evaluation conducted on lines presubscribed to One Call Communications, Inc. (One Call) in the GTE Plant City exchange during the period of January 21 through February 17, 1997.

The test results indicated that One Call overtimed some of the calls. After investigating the situation, One Call has determined that the discrepancies occurred because of the way it "rounds" the timing of its calls. For example, take a look at a call which starts at 15:45:08, is answered at 15:45:18 and ends at 15:47:20. From start to answer is 10 seconds. From start to end is 132 seconds. To figure billed minutes, subtract start to answer time from start to end time, which gives you 122 seconds, or 2 minutes and 2 seconds.

At the time of the evaluation, One Call's billing system was rounding start to end time up to the nearest tenth of a minute and rounding start to answer time down to the nearest tenth of a minute before determining billed minutes. So, using the example above, start to answer would be .1 minutes rather than 10 seconds and start to end time would be 2.2 minutes rather than 132 seconds. When you subtract .1 minutes from 2.2 minutes, you get 2.1 minutes rather than 2 minutes and 2 seconds (122 seconds).

In an effort to correct the overtiming issue, One Call made changes to its billing system in late February. Now, both start to end time and start to answer time are rounded up to the nearest tenth of a minute before determining billed minutes.

If you have questions or require additional information, please call me at (800) 876-1300.

Respectfully,

Laura Clore

Regulatory Manager

+ pura Clore

Page 23

### STATE OF FLORIDA

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
JOE GARCIA
DIANE K. KIESLING



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

# Public Service Commission

November 21, 1997 CERTIFIED

Ms. Laura Clore Regulatory Manager One Call Communications, Inc. 801 Congressional Blvd., Suite 100 Carmel, Indiana 46032

Re: September 22, 1997 letter to Don McDonald

Dear Ms. Clore:

We have reviewed your response to the overtiming of 1+ and 0+ services discovered during the January 21 through February 17, 1997 evaluation of your company. Staff have some concerns which you did not address in your letter. Please provide responses to the following:

- How long was One Call's billing system overtiming calls?
- How many of your subscribers were affected by the overtiming?
- 3. How many of the subscribers affected are still subscribers of One Call Communications?
- 3. What is the amount of additional revenue gained by the overtiming?
- 4. Can you determine how much each individual subscriber was overcharged due to the overtiming of the calls?
- Has One Call made any efforts to refund the affected subscribers? If so, explain in detail.

A copy of your response is enclosed along with the September 3, 1997 evaluation results. Please respond in writing by December 15, 1997. If you have any questions, please contact Clayton Lewis at (850) 413-6578 or fax (850) 413-6579.

Page 24

Ms. Clore November 21, 1997 Page 2

Rule 25-4.043, Response to Commission Staff Inquiries states: "The necessary replies to inquiries propounded by the Commission's staff concerning service or other complaints received by the Commission shall be furnished in writing within fifteen (15) days from the date of the Commission inquiry."

Sincerely,

Don McDonald

U.S./Comm. Engineer Supervisor Bureau of Service Evaluation

Enclosure

cc:

Alan Taylor Clayton Lewis



ONE CALL COMMUNICATIONS, INC.

Corporate Counsel

Ann C. Bernard

December 15, 1997

Mr. Clayton Lewis Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Letter of November 21, 1997

Dear Mr. Lewis:

Your letter of November 21, 1997 was received and has been referred to Ann C. Bernard, Corporate Counsel for One Call Communications. Please be aware that this situation is being investigated by One Call, however, Mrs. Bernard is currently on maternity leave and will not return until January of 1998.

If you have any questions or concerns, please feel free to reach Mrs. Bernard at her home number of 317-848-7434.

Very truly yours,

Sarada D. Rose Legal Assistant

> RECEIVED DEC 19 1952-

> > смц,

### STATE OF FLORIDA

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JOE GARCIA
E. LEON JACOBS, JR.



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

# Public Service Commission

March 3, 1998 CERTIFIED

Ms. Ann C. Bernard
Corporate Counsel
One Call Communications, Inc.
801 Congressional Blvd., Suite 100
Carmel, Indiana 46032

Re: December 15, 1997 letter to Don McDonald from Ms. Sandra D. Rose

Dear Ms. Bernard:

Staff has not received an appropriate response to our November 21, 1997 request letter. On December 15, 1997, the Commission received a letter on your behalf from Ms. Sandra D. Rose (One Call) explaining that the overtiming problem discovered during an evaluation of your company last year had been referred to you. She also stated that you would not be able to answer our request until January 1998 due to maternity leave. Staff believes that One Call Communications' response is severely overdue.

## Rule 25-4.019, Records and Reports in General, Florida Administrative Code states:

(1) Each utility shall furnish to the Commission at such times and in such form as the Commission may require, the results of any required tests and summaries of any required records. The utility shall also furnish the Commission with any information concerning the utility's facilities or operations which the Commission may reasonably request and require. All such data, unless otherwise specified, shall be consistent with and reconcilable with the utility's annual report to the Commission.

Furthermore, Rule 25-4.043, Response to Commission Staff Inquiries, F.A.C, states: "The necessary replies to inquiries propounded by the Commission's staff concerning service or other complaints received by the Commission shall be furnished in writing within fifteen (15) days from the date of the Commission inquiry".

Page 27

Ms. Ann C. Bernard Page 2 March 3, 1998

Staff believes that One Call Communications has had an ample amount of time to respond to staff's request. Please respond in detail by *March 23, 1998*. Failure to respond will result in an immediate filling of show cause proceedings against One Call Communications before the Florida Public Service Commission. Should you have any questions, please contact Clayton Lewis at (850) 413-6578 or fax (850) 413-6579.

Sincerely,

Don McDonald

U.S./Comm. Engineering Supervisor Bureau of Service Evaluation

#### Enclosures

December 15, 1997 letter to Don McDonald from Sandra Rose November 21, 1997 PSC request to One Call Communications September 22, 1997 One Call response to evaluation results. September 3, 1997 PSC service evaluation results and request.

cc: Alan Taylor

Phil Trublehorn Clayton Lewis

Ms. Laura Close, Regulatory Manager / One Call Communications Ms. Sandra D. Rose, Legal Assistant / One Call Communications

Page 1

LAW OFFICES

## Messer, Caparello & Self

A PROFESSIONAL ASSOCIATION

ZIS SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876

TALLAMASSEE, FLORIDA 32302-1876
TELEPHONE. (904) 222 0720
TELECOPIERS (904) 224-4389; (904) 425-1942

March 23, 1998

RECEIVED

440 2 3 1993

BY HAND DELIVERY

Mr. Don McDonald
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

a Public Service Commission

Dear Mr. McDonald:

On behalf of One Call Communications, Inc. d/b/a Opticom, this is in response to your letter of November 21, 997 and our subsequent meeting March 11, 1998. Your November letter requested additional information with respect to the results of the service evaluation of Opticom performed January 21st through February 17, 1997. In that evaluation, Staff found some overtimed calls among the test calls that were made. In previous service evaluations Staff had determined that Opticom was undertiming some of the test calls that had been made. As a result of these earlier results adjustments were made to the billing system to eliminate the undertiming. In the most recent evaluation some calls are now being overtimed and as expressed to you during our meeting we want to correct this.

According to our records, the possibility for overtiming of calls would have existed from November 28, 1995 through February 18, 1997 or a period of approximately fifteen (15) months. The overtiming occurred because of the rounding of the timing of the calls, in part due to the earlier correction. During this period Opticom's billing system rounded start to end time up to the nearest 1/10th of a minute and start to answer time down to the nearest 1/10th of a minute before determining billed minutes. To calculate billed minutes, start to answer time is subtracted from the start to end time and the remaining time would give you the billed minutes. We have again revised our billing system and now both start to end time and start to answer time are rounded up before determining billed minutes. This should correct this overtiming situation but may again result in undertiming. We intend to incorporate the attached language in our present tariff as part of our corrective action.

In your letter and in our subsequent meeting you asked about the revenue implications of the overtiming and our plans to refund any "excess" revenues. First, we do not have records for the period in question. To determine the possible effect of overtiming we utilized records from

Mr. Don McDonald March 23, 1998 Page 2

September 1997 which we believe to be a representative period. For the month of September, 1997 our records indicate a total of 82,813 calls consisting of 269,059.3 minutes and \$36,365.87 in revenue or an average of 13.5¢ per minute. If all calls were overtimed, which was not the case, the total "excess" revenue in question would be \$1,117.97 per month or approximately \$15,000.00. Recognizing that not all calls were overtimed as reflected in your service evaluation, we propose to refund \$7,500 or 50% of the "excess" revenue. We propose to refund this amount by way of a prospective reduction over a period of 6 months or until the \$7,500 has been returned, whichever occurs first.

We recognize that revenues are generally refunded or credited to customers but our proposal for a prospective reduction is the most appropriate method because of the customer base served by Opticom. Most of the customers of Opticom are other providers of services, such as pay telephone providers or travel card users. We serve very few end user residential or business customers. To make a refund to the other providers would not be refunding anything to the actual end user and we do not have the necessary records in order to enable us to make that type of refund. Moreover, since most of the users of the service we offer are transient and many probably did not make more than one or two phone calls, the amount of money to credited or refunded to those customers, assuming they could ever be found, would be very minimal, in fact in some instances less than 2 cents a call. Because of this, we believe our proposal to reduce our revenue by \$7,500.00 on a going forward basis by a rate reduction process would be fair to the consumers.

We believe that our actions and proposal best resolve the present situation and would urge approval by the Commission. Should you have any questions as to the proposal please do not hesitate to call. Finally, I want to thank you for taking the time to meet with Ms. Bernard and I recently.

Sincerely,

Norman H. Horton, Jr.

Nerman Hoton

NHH/amb

cc:

Ms. Ann Bernard Mr. Clayton Lewis

## Florida Proposed Tariff Language

3.2.7 Company determines billed minutes by subtracting start to answer time from start to end time. Both start to end time and start to answer time are rounded up to the nearest tenth of a minute before determining billed minutes.