101 Market Street, Suite 700, San Francisco, CA 94105 • www.workingassets.com

July 7, 2005

Donald McDonald Bureau of Service Quality Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850



RE:

Working Assets Long Distance - 2005 Interexchange Service Evaluation

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Proposed refund plan

Dear Mr. McDonald:

Enclosed is Working Assets proposed refund plan for the error discovered in our 2005 service evaluation.

If you have any questions, please contact me at 415-369-2053

Sincerely,

Jean Parker

Manager of Legal Affairs

Cc:

Melinda Watts via email

Penelope Davis via email

Enc.

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DOCUMENT NUMBER - DATE

06499 JULII8

CHOO COMMISSION OF EDA

Working Assets Long Distance - Interexchange Service Evaluation Proposed refund plan July 7, 2005

Refund Dates:

June 6, 1999 to May 19, 2005

Surcharge amount:

\$0.99/call

Total number of calls:

15,112*

Total # of affected customers:

2,732*

of active affected customers:

1,651*

of disconnected affected customers:

1,148*

Total refund amount, including

Payment to FL PSC General Fund:

\$14,960.88*

Payment to FL PSC General Fund:

\$7,060.68*

Average refund per customer:

\$5.48*

Average cost per refund check:

\$7.52

Proposal: Working Assets proposes a bill credit to active affected customers within 90 days of Commission approval of a rebate plan. Due to the excessive cost of issuing refund checks to disconnected customers, Working Assets proposes payment to the Florida Public Service Commission General Fund equal to the surcharge amount incurred by disconnected customers (cost estimate for refund checks provided under separate confidential cover). Working Assets proposes an additional payment to the Florida Public Service Commission General Fund equal to the estimated refund amount for the June 1999 to May 2000 time period.

^{*}Data from June 1999 to May 2000 was archived in an unrecognizable file format and our Data Department is unable to delimit the file thus rendering the information irretrievable. We have estimated the data for this time period by using the data from June 2000 to December 2000 (number of accts from June 2000 to December 2000/7months*12 = estimated number of affected accounts from June 1999 to May 2000; number of calls from June 2000 to December 2000/7 months*12 = estimated number of calls from June 1999 to December 2000; estimated number of calls*\$0.99 = estimated rebate amount) and included the estimated amounts in our totals.

Costs of processing a refund check

REDACTED 1. Customer service cost (data research, issuing checks) 2. Letter (paper and processing) REDACTED REDACTED 3. Postage 4. Maintenance costs (replace lost checks, return old checks to

CA as unclaimed property if not cashed, etc.) Total cost per check

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Detail for item 1

Customer service cost to process refund check for credit balances: REDACTED

