

REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

ACCERIS MANAGEMENT AND ACQUISITION, LLC

Sarasota Exchange

April 24, 2006 through May 18, 2006

Division of Competitive Markets & Enforcement

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Report on Telecommunications Service Quality

For

Acceris Management and Acquisition, LLC

The Bureau of Telecommunications Service Quality, Certification, and Enforcement of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct service quality evaluations of the telecommunications services provided by Interexchange Companies (IXCs) operating within the state of Florida. Section 364.08(1), Florida Statutes, mandates that "A telecommunications company may not charge, demand, collect, or receive for any service rendered or to be rendered any compensation other than the charge applicable to such service as specified in its schedule on file and in effect at that time. A telecommunications company may not refund or remit, directly or indirectly, any portion of the rate or charge so specified or extend to any person any advantage of contract or agreement or the benefit of any rule or regulation or any privilege or facility not regularly and uniformly extended to all persons under like circumstances for like or substantially similar service."

The service quality evaluation objectives for the Bureau 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 per tariff or a price list on file with Commission.

A team of engineering specialists performed a service evaluation on Acceris Management and Acquisition, LLC (Acceris), during the period of April 24, 2006, through May 18, 2006. The test calls were conducted at a central office of the Sarasota 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

Rule 25-24.485(g) Florida Administrative Code, states, "Companies shall charge only the rates contained in their tariff." This rule applies to all sections of an evaluation.

During the service evaluation, a series of test calls were generated to measure the timing of toll calls for billing analysis. These tests were precisely timed to ensure that the elapsed times were the same for each carrier's series of calls. To evaluate the accuracy of each IXC, all test calls were completed using a computerized timing tester. Normally, calls are 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 142 1+ test calls over Acceris's network to verify the timing accuracy. The test calls were made to numbers outside the Sarasota exchange and outside the Tampa Market Area LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that Acceris timed all calls correctly yielding a 100 percent timing accuracy for 1+ calls. Acceris exceeded the 97 percent timing accuracy objective.

Table 1 Inter-LATA 1+ Timing Accuracy					
	Total Number of Calls	Number of Calls <u>Under Timed</u>	Number of Calls Over Timed	Percent of Calls Correctly Timed	97% Objective <u>Met</u>
Timing Accuracy					
1+	142	0	0	100.0%	Y

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. Acceris did not bill any of the calls correctly. This resulted in 0 percent billing accuracy and therefore did not meet the 97 percent billing accuracy objective.

Acceris's response to the billing discrepancy was that it had placed staff's test account on a different rate plan than the one in its tariff. Acceris has subsequently updated its tariff to reflect the pricing that was used during the evaluation. Since Acceris did not have an updated tariff before the evaluation, the results did not change. Table 2 indicates the underbilled and overbilled test calls that were reconciled with the tariff on file at the time of testing.

Table 2 Inter-LATA 1+ Billing Accuracy						
	Total Number of Calls	Number of Calls <u>Under Billed</u>	Number of Calls Over Billed	Percent of Calls Correctly Billed	97% Objective <u>Met</u>	
Billing Accuracy						
1+	142	119	23	0.0%	N	

Staff asked Acceris to investigate the overcharging problem between the plan that was used during the testing and the plan that was in its tariff at the time of the evaluation. Acceris stated in its response that it found 1,351 calls that were overcharged. The total amount of the overcharging was \$6.76 and Acceris is in the process of refunding to the affected customers.

III. Inter-LATA 1+ Billing per Tariff

Of the 142 1+ test calls that staff made, Acceris undercharged 119 calls and overcharged 23 calls. Acceris did not use a plan that was in its tariff for the test calls. Because of these results, Acceris did not bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 143 calling card test calls over Acceris's network to verify the timing accuracy. The test calls were made to numbers outside the Sarasota exchange and outside the Tampa Market Area LATA utilizing Acceris's calling card. Acceris timed all calls correctly yielding 100 percent timing accuracy for its calling card calls and exceeded the 97 percent objective.

Table 3 Inter-LATA Calling Card Timing Accuracy					
	Total Number of Calls	Number of Calls <u>Under Timed</u>	Number of Calls Over Timed	Percent of Calls Correctly Timed	97% Objective <u>Met</u>
Timing Accuracy					
Calling Card	143	0	0	100.0%	Y

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. Acceris did not bill any of the calls correctly. This resulted in 0 percent billing accuracy.

Acceris's response to the billing discrepancy was that Acceris placed staff's test account on a different rate plan than what staff found in its tariff. Acceris has updated its tariff to reflect the pricing that was used during the evaluation. Since Acceris did not have an updated tariff before the evaluation, the results did not change. Acceris failed to meet the 97 percent billing accuracy objective. It is significant to note the test calls were all under billed (see table 4).

Table 4 Inter-LATA Calling Card Billing Accuracy					
	Total Number of Calls	Number of Calls <u>Under Billed</u>	Number of Calls Over Billed	Percent of Calls Correctly Billed	97% Objective <u>Met</u>
Billing Accuracy					
Calling Card	143	143	0	0.0%	N

VI. Inter-LATA Calling Card Billing per Tariff

Of the 143 calling card test calls that staff made, Acceris undercharged all of the calls. Acceris did not use a plan that was in its tariff for the test calls. Because of these results, Acceris did not bill per tariff.