



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

COMTEL TELCOM ASSETS LP.
d/b/a VARTEC TELECOM

Chiefland Exchange

April 2 - 20, 2007

Division of Competitive Markets & Enforcement

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Report on Telecommunications Service Quality

For

Comtel Telcom Assets LP d/b/a VarTec Telecom

Engineering Specialists 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 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 or a price list on file with the Commission.

Staff performed a service evaluation on Comtel Assets LP d/b/a VarTec Telecom (Comtel), during the period of April 2 - 13, 2007. The test calls were conducted at a central office of the Chiefland 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

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. To evaluate the accuracy of Comtel, 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 139 1+ test calls over Comtel's network to verify the timing accuracy. The test calls were made to numbers outside the Chiefland 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 Comtel timed 138 calls correctly and undertimed one call yielding 99.3 percent timing accuracy for 1+ calls. Comtel met the 97 percent timing accuracy objective.

Table 1 Inter-LATA 1+ Timing Accuracy					
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed	97% Objective Met
Timing Accuracy					
1+	139	1	0	99.3%	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 found in Table 2. Comtel underbilled the same call that was undertimed. This resulted in 99.3 percent billing accuracy and therefore Comtel met the 97 percent billing accuracy objective.

Table 2 Inter-LATA 1+ Billing Accuracy					
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed	97% Objective Met
Billing Accuracy					
1+	139	1	0	99.3%	Y

III. Inter-LATA 1+ Billing per Tariff

Even though Comtel undertimed and underbilled one call, the company used the timing increments and rates listed in its tariff. Staff concludes that Comtel did bill per tariff.