



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

GLOBAL CROSSING
TELECOMMUNICATIONS, INC.

Lake Buena Vista Exchange

February 12 - February 16, 2007

Division of Competitive Markets & Enforcement

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Report on Telecommunications Service Quality

For

Global Crossing Telecommunications, Inc.

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 Global Crossing Telecommunications, Inc. (Global Crossing), during the period of February 12 - February 16, 2007. The test calls were conducted at a central office of the Lake Buena Vista 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. To evaluate the accuracy of Global Crossing, 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 178 1+ test calls over Global Crossing’s network to verify the timing accuracy. The test calls were made to numbers outside the Lake Buena Vista exchange and outside the Orlando LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that Global Crossing overtimed 72 calls and undertimed 3 calls. Global Crossing correctly timed 103 yielding a 57.9 percent timing accuracy for 1+ calls. Global Crossing did not meet the 97 percent timing accuracy objective.

In the response to the draft report, Global Crossing stated that its billing system was programmed to time the 1+ plan that staff was assigned in one minute increments with a one minute minimum per call. Global Crossing’s tariff states that this plan would be timed in six seconds increments with a thirty second minimum per call. Global Crossing stated it has corrected the billing system to conform to the tariff. Because the billing system was programmed incorrectly during the time that staff made the test calls, Global Crossing’s result will not change. Global Crossing will be retested at the earliest opportunity.

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+	178	3	72	57.9%	N

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. Because Global Crossing overtimed 72 calls, those calls were also overbilled. Three calls were underbilled and 103 calls were billed correctly. This resulted in 57.9 percent billing accuracy and therefore Global Crossing did not meet the 97 percent billing accuracy objective.

Global Crossing found that even though the timing was incorrect, it was still using the rate that is listed in the tariff. As stated in the section above, Global Crossing corrected the billing system to time in the increments listed in the tariff. Additionally, Global Crossing researched the customers affected by this billing issue and found fifty-five customers. Global Crossing is proposing to refund the affected customers \$50.00 each. This issue will be addressed in Docket Number 070419-TI. As stated in the timing accuracy section, the results will not change because the billing system was programmed incorrectly during the time of staff’s test calls.

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+	178	3	72	57.9%	N

III. Inter-LATA 1+ Billing per Tariff

Of the 178 1+ test calls that staff made, Global Crossing did not bill or time 75 calls according to its tariff. Because of these results, staff concludes that Global Crossing did not bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 129 calling card test calls over Global Crossing’s network to verify the timing accuracy. The test calls were made to numbers outside the Lake Buena Vista exchange and outside the Orlando LATA utilizing Global Crossing’s calling card. Global Crossing undertimed 75 and overtimed two calls. Global Crossing timed 52 calls correctly, yielding 40.3 percent timing accuracy for its calling card calls and therefore it did not the 97 percent objective.

The same issue that affected the 1+ test calls also affected the calling card test calls. Global Crossing stated the calling cards test calls were timed in six second increments with a one minute minimum per call. The tariff states that the calling card plan should be timed in one minute increments with one minute minimum per call. As stated earlier, Global Crossing corrected the billing system to conform to its tariff. Since the billing system was incorrect during the time of the staff’s test calls, the results will not change.

Table 3 Inter-LATA Calling Card Timing Accuracy					
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed	97% Objective Met
Timing Accuracy					
Calling Card	129	75	2	40.3%	N

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. Global Crossing overbilled all of the calls. This resulted in 0 percent billing accuracy. Global Crossing did not meet the 97 percent objective.

In the response to the draft report, Global Crossing found that the rate that staff was charged for the calling card test calls was \$0.35 per minute for a day call and \$0.30 per minute for an evening call. Global Crossing’s tariff stated the calling card plan that was assigned to staff’s account was \$0.2469 per minute for a day call and \$0.2117 per minute for an evening call. The incorrect rate caused the overbilling on all of the test calls. The billing system has been corrected

to conform to Global Crossing's tariff. Global Crossing researched the number of customers that were affected by the overbilling on the calling card plan and found four customers. Global Crossing is proposing refunding the customers \$50.00. This issue will be addressed in Docket Number 070419-TI. Because the incorrect rate was programmed in the billing system during our test calls, the results will not change.

Table 4 Inter-LATA Calling Card Billing Accuracy					
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed	97% Objective Met
Billing Accuracy					
Calling Card	129	0	129	0.0%	N

VI. Inter-LATA Calling Card Billing per Tariff

Of the 129 calling card test calls that staff conducted, Global Crossing over charged all of the calls. Because of these results, staff concludes that Global Crossing did not bill according to its tariff.