



## REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

**EMBARQ FLORIDA, INC.**

Alford, Cherry Lake, Cottondale, Grand Ridge, Greenville, Greenwood, Lee, Madison, Malone,  
Marianna, and Sneads Exchanges

*September 10 – October 16, 2007*

Division of Competitive Markets & Enforcement  
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# TABLE OF CONTENTS

| <b>Category</b>                                     | <b>Page No.</b> |
|---|-----------------|
| I. Answer Time .....                                | 2               |
| II. Adequacy of Directory Services.....             | 3               |
| A. Directory Review .....                           | 3               |
| B. New Numbers in Directory Assistance .....        | 4               |
| III. Availability of Service (Installation) .....   | 4               |
| IV. Subscriber Loops – Transmission.....            | 6               |
| V. Repair Service Summary.....                      | 7               |
| A. Out-of-Service Restored Within 24 Hours.....     | 8               |
| B. Service Affecting Restored Within 72 Hours ..... | 9               |
| C. Rebates .....                                    | 10              |
| VI. Periodic Report Review.....                     | 11              |
| VII. Safety – Ground Deficiencies.....              | 14              |
| VIII. Timing and Billing Accuracy.....              | 15              |
| A. Intra-LATA 1+ and Calling Card.....              | 15              |
| B. Directory Assistance .....                       | 15              |
| IX. 9-1-1 Emergency Service .....                   | 16              |
| X. Service Guarantee Program (SGP) Rebates .....    | 17              |
| A. Installation SGP Rebates .....                   | 17              |
| B. Out-of-Service SGP Rebates .....                 | 18              |
| XI. SGP Answer Time .....                           | 21              |
| XII. SGP Report Review.....                         | 21              |
| XIII. Company’s Response to Draft.....              | 24              |

## LIST OF TABLES

| <b>Tables</b>   | <b>Page No.</b> |
|---|-----------------|
| <b>Table 1 Answer Time – Business Office</b> .....                                  | <b>2</b>        |
| <b>Table 2 Answer Time – Repair Service</b> .....                                   | <b>3</b>        |
| <b>Table 3 Directory Reviewed</b> .....   | <b>3</b>        |
| <b>Table 4 New Numbers in Directory Assistance</b> .....                            | <b>4</b>        |
| <b>Table 5 Availability of Service (Installation)</b> .....                         | <b>6</b>        |
| <b>Table 6 Subscriber Loops – Transmission</b> .....                                | <b>7</b>        |
| <b>Table 7 Out-of-Service (OOS) Reports Restored Within 24 Hours</b> .....          | <b>9</b>        |
| <b>Table 8 Service Affecting (SA) Reports Restored Within 72 Hours</b> .....        | <b>10</b>       |
| <b>Table 9 Rebates</b> .....  | <b>11</b>       |
| <b>Table 10 Periodic Report Review</b> .....  | <b>13</b>       |
| <b>Table 11 Safety – Ground Deficiencies</b> .....                                  | <b>14</b>       |
| <b>Table 12 Timing and Billing – Directory Assistance</b> .....                     | <b>16</b>       |
| <b>Table 13 911 Emergency Service</b> .....   | <b>17</b>       |
| <b>Table 14 Installation SGP Rebates</b> .....                                      | <b>19</b>       |
| <b>Table 15 Out-of-Service SGP Rebates</b> .....                                    | <b>20</b>       |
| <b>Table 16 Small Exchanges OOS Percentages – 2<sup>nd</sup> Quarter 2007</b> ..... | <b>21</b>       |
| <b>Table 17 SGP Report Review</b> .....   | <b>22-23</b>    |

# **Report on Telecommunications Service Quality**

**For**

## **Embarq Florida, Inc.**

Engineering Specialists of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct field service evaluations of the telecommunications services provided by Incumbent Local Exchange Companies (ILECs), Interexchange Companies (IXCs), and Competitive Local Exchange Companies (CLECs) operating within the state of Florida. Section 364.01(4)(c), Florida Statutes, mandates the Commission "protect the public health, safety, and welfare by ensuring the monopoly services provided by telecommunications companies continue to be subject to effective price, rate, and service regulation."

The service evaluation objectives are (1) to evaluate a company's performance based on service standards and rules; (2) to verify the service results the company reported to the Commission on a periodic basis; (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations; and (4) to determine if the company is adhering to the Service Guarantee program approved by the Commission.

Staff performed a service evaluation on Embarq Florida, Inc. (Embarq), during the period of September 10 – October 16, 2007. The exchanges reviewed were Alford, Cherry Lake, Cottondale, Grand Ridge, Greenwood, Greenville, Lee, Madison, Malone, Marianna, and Sneads. The categories staff evaluated were as follows:

- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes Directory Review and New Number in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops - Transmission
- Repair Service, which includes Out-of-Service Restored within 24 Hours, Service Affecting Restored within 72 Hours, and Rebates
- Periodic Report Review
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+ and calling card, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions
- Service Guarantee Program (SGP) Rebates, which includes Installation SGP Rebates and Out-of-Service SGP Rebates
- Service Guarantee Program (SGP) Answer Time
- Service Guarantee Program (SGP) Report Review

## I. Answer Time

Rule 25-4.073 (1) (b)(c), F.A.C., Answering Time states:

(b) When a company utilizes a menu driven automated interactive answering system (referred to as the system or as an Integrated Voice Response Unit (IVRU) at least 95 percent of the calls shall be answered within 15 seconds after the last digit is dialed. The initial recorded message presented by the system to the customer shall include the option of transferring to a live attendant within the first 30 seconds of the message.

(c) For subscribers who either select the option of transferring to a live assistant [when the company utilizes a menu driven automated, interactive answering system], or do not interact with the system for twenty seconds, the call shall be transferred by the system to a live attendant. At least 90 percent of the calls shall be answered by the live attendant prepared to give immediate assistance within 55 seconds of being transferred to the attendant.

Staff conducted 151 calls to Embarq’s business office and 150 calls to Embarq’s repair service center. These calls were voice calls and Embarq does utilize a menu driven, automated, interactive answering system or an IVRU. According to the rule above, the standard for the business office and the repair service is 90 percent of all calls should be answered within 55 seconds of being transferred to the attendant. Additionally, staff made calls using a Telecommunications Device for the Deaf (TDD) to both the business office and repair service; 57 and 58 calls, respectively.

Table 1, Answer Time – Business Office, illustrates Embarq answering 99.3 percent of the voice calls within the allotted time, exceeding the answer time standard. Only 78.9 percent of the TDD calls were answered, missing the 95 % standard. The twelve failed calls were reported as receiving a busy signal or a ring-no-answer; however, all of the answered calls were answered within 55 seconds.

| <b>Table 1 Answer Time – Business Office</b> |                    |                     |                           |                      |                       |                                 |                            |                      |
|--|--------------------|---------------------|---------------------------|----------------------|-----------------------|---------------------------------|----------------------------|----------------------|
| <b>Type of Calls</b>                         | <b>Total Calls</b> | <b>Calls Failed</b> | <b>% of Calls Offered</b> | <b>95 % Std Met?</b> | <b>Calls Answered</b> | <b>Calls Answered in 55 sec</b> | <b>% Answered w/i Std.</b> | <b>90% Std. Met?</b> |
| <b>Voice</b>                                 | 151                | 5                   | 96.7%                     | <b>Y</b>             | 146                   | 145                             | 99.3%                      | <b>Y</b>             |
| <b>TDD</b>                                   | 57                 | 12                  | 78.9%                     | <b>N</b>             | 45                    | 45                              | 100%                       | <b>Y</b>             |

Table 2, Answer Time – Repair Service, illustrates Embarq answering 98.7 percent of voice calls within the allotted time, exceeding the answer time standard. Only 91.3 percent of the TDD calls were answered, missing the 95% standard. The three failed calls were reported as either receiving a busy signal or a ring-no-answer; however, all answered calls were answered within 55 seconds.

| <b>Table 2 Answer Time – Repair Service</b> |                    |                     |                           |                      |                       |                                  |                            |                      |
|---|--------------------|---------------------|---------------------------|----------------------|-----------------------|----------------------------------|----------------------------|----------------------|
| <b>Type of Calls</b>                        | <b>Total Calls</b> | <b>Calls Failed</b> | <b>% of Calls Offered</b> | <b>95 % Std Met?</b> | <b>Calls Answered</b> | <b>Calls Answered in 55 sec.</b> | <b>% Answered w/i Std.</b> | <b>90% Std. Met?</b> |
| <b>Voice</b>                                | 150                | 1                   | 99.3%                     | <b>Y</b>             | 149                   | 147                              | 98.7%                      | <b>Y</b>             |
| <b>TDD</b>                                  | 58                 | 5                   | 91.3%                     | <b>N</b>             | 53                    | 53                               | 100%                       | <b>Y</b>             |

In Embarq’s 2008 response it states “busy conditions encountered when dialing the business office and repair appear to be the result of introducing additional calls that deviate from the norm and thus the potential to experience a line busy condition.” During the 2005 evaluation, Embarq Florida was experiencing an employee strike and staff had to leave early due to an approaching hurricane. The amount of calls made to the Business and Repair offices were minute; therefore, the answer time survey contained insufficient data. Subsequently, Staff could not make an accurate answer time assessment.

## **II. Adequacy of Directory Services**

### **A. Directory Review**

Rule 25-4.040, F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons are the applicable rules staff applies when evaluating the adequacy of directory services. These rules require specific actions, such as publishing updated telephone directories once every twelve months. They also require “911” instructions to be listed on the inside of the front cover as well as the FPSC contact information. Other specific instructions include a TDD listing for the incumbent’s business office.

Staff reviewed Embarq’s telephone directory for 22 items. The telephone directory labeled “Madison and Jefferson Counties” included the Cherry Lake, Greenville, Lee, and Monticello Exchanges. The directory complied with the standards and Embarq provides itemized billing to its customers required by Rule 25-4.110, F.A.C., Customer Billing for Local Exchange Telecommunications Companies. The rule requires an itemized bill at least once every twelve months along with “a bill stuffer which explains the itemization and advises the customer to verify the items and charges on the itemized bill.” Embarq provides an itemized bill monthly.

| <b>Table 3 Directory Reviewed</b>                    |                             |                                      |   |                       |
|--|-----------------------------|--------------------------------------|---|-----------------------|
| <b>Name/ Date of Directory</b>                       | <b>Total Items Reviewed</b> | <b>Items in Compliance with Std.</b> | <b>% of Items in Compliance with Std.</b> | <b>100% Std. Met?</b> |
| <b>Madison and Jefferson Counties September 2006</b> | <b>22</b>                   | <b>22</b>                            |   |                       |
| <b>Company Total</b>                                 | <b>22</b>                   | <b>22</b>                            | <b>100%</b>                               | <b>Y</b>              |

## B. New Numbers in Directory Assistance

Rule 25-4.040 (5), F.A.C., Telephone Directories; Directory Assistance states:

Directory assistance operators shall maintain records of all telephone numbers (except for non-published telephone numbers) in the area for which they have the responsibility of furnishing service. . . . All new or changed listings shall be provided to directory assistance operators within 48 hours after connection of service, excluding Saturdays, Sundays and holidays.

Staff reviewed 123 service orders more than 48 hours old, but not more than 72 hours old after connection of service. Staff called directory assistance (DA) to verify the subscribers were in the DA database using the service orders as a guide. Staff made 128 calls to DA requesting 123 numbers. Staff validated the DA's incorrect responses and five calls were excluded as repeat calls to DA. Embarq's directory assistance found 119 of the requested numbers. The four misses recorded by staff were explained by Embarq as two occasions where there were two separate listings available for the customers with "the remaining two misses were attributable to human error that occurred during the operator's search for the respective listings." Therefore, 121 listings were found. Table 4 represents the DA test results indicating that Embarq did not meet the standard.

| <b>Table 4 New Numbers in Directory Assistance</b> |                             |                          |                      |                      |
|--|-----------------------------|--------------------------|----------------------|----------------------|
| <b>Calls made to DA</b>                            | <b>Requests for Numbers</b> | <b>Total Found in DA</b> | <b>% Found in DA</b> | <b>99% Std. Met?</b> |
| <b>128</b>   | <b>123</b>                  | <b>121</b>               | <b>98.4%</b>         | <b>N</b>             |

## III. Availability of Service (Installation)

Rule 25-4.066 (2), F.A.C., Availability of Service states:

Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied in each exchange of at least 50,000 lines and quarterly in exchanges of less than 50,000 lines within an interval of three working days after receipt of application when all tariff requirements relating thereto have been complied with, except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

Rule 25-4.066 (3), F.A.C., Availability of Service states:

If the applicant requests an installation date beyond three working days, the requested date shall be counted as day three for measurement purposes.

Rule 25-4.066 (4), F.A.C., Availability of Service states:

When an appointment is made in order for the company to gain access to the customer's premises, the mutually agreed upon date will be day three for measurement purposes.

Eleven exchanges were reviewed during the evaluation and all of the exchanges had less than 50,000 access lines. Staff requested the service orders for the second quarter of 2007, which is the period of April 1 - June 30, 2007.

During the Alford exchange service order review, no orders were excluded. The exclusion of service orders only occurs where construction of facilities is required or the order is for non basic service. Staff bases exclusion on the rule, as noted above, that states when facilities are readily available, service will be provided within three days for 90 percent of the service requests. Therefore, when the service order requires the construction of facilities then it is not readily available and it is excluded from the availability of service calculation. Seventy-two of the seventy-three orders were completed either within three days, on the appointment day and time, or on the day that the customer requested if it was greater than three days. This resulted in 98.6 percent of the service orders being completed within the allotted timeframe. The results for the Alford exchange indicate that Embarq exceeded the availability of service standard.

Staff reviewed 56 orders for the Cherry Lake exchange with six orders being excluded. Forty-six of the remaining 50 orders were completed within standards resulting in 92 percent of the service orders being completed within the standard. For the Cottdale exchange, 67 orders were reviewed with one order excluded because it was delayed for construction. Forty-eight orders were completed within standards yielding a 72.7 percentage. In the Grand Ridge exchange, staff reviewed 78 service orders with 6 orders being excluded or delayed for construction. Seventy-one of those orders were completed within standards. The result was 98.6 percent compliance.

The Greenwood and Greenville exchanges availability of service percentages were 96.8 percent and 83.7 percent. The Lee exchange registered 89.4 percent compliance while the Madison exchange received a 98.6 percent. The Malone, Marianna, and Sneads exchanges exceeded the 90 percent with compliances of 97.7 percent, 98.8 percent and 100 percent standard respectively. In 2005, six exchanges were evaluated with each having less than 50,000 access lines and all of the exchanges met the 90 percent standard.



| <b>Table 5 Availability of Service (Installation) 2<sup>nd</sup> Qtr 2007</b> |                              |                        |                                  |                   |                                  |                                       |                       |
|---|------------------------------|------------------------|----------------------------------|-------------------|----------------------------------|---------------------------------------|-----------------------|
| <b>Exchange</b>   | <b>Total Orders Reviewed</b> | <b>Orders Excluded</b> | <b>Orders Delayed for Const.</b> | <b>Net Orders</b> | <b>Orders Completed w/I Std.</b> | <b>% of Orders Completed w/i Std.</b> | <b>90 % Std. Met?</b> |
| Alford  | 73                           | 0                      | 0                                | 73                | 72                               | 98.6%                                 | Y                     |
| Cherry Lake   | 56                           | 6                      | 0                                | 50                | 46                               | 92%                                   | Y                     |
| Cottdale  | 67                           | 1                      | 0                                | 66                | 48                               | 72.7%                                 | N                     |
| Grand Ridge   | 78                           | 3                      | 3                                | 72                | 71                               | 98.6%                                 | Y                     |
| Greenwood   | 35                           | 1                      | 3                                | 31                | 30                               | 96.8%                                 | Y                     |
| Greenville  | 44                           | 1                      | 0                                | 43                | 36                               | 83.7%                                 | N                     |
| Lee   | 51                           | 2                      | 2                                | 47                | 42                               | 89.4%                                 | N                     |
| Madison   | 154                          | 9                      | 2                                | 143               | 141                              | 98.6%                                 | Y                     |
| Malone  | 45                           | 1                      | 0                                | 44                | 43                               | 97.7%                                 | Y                     |
| Marianna  | 170                          | 2                      | 1                                | 167               | 165                              | 98.8%                                 | Y                     |
| Sneads  | 71                           | 3                      | 0                                | 68                | 68                               | 100%                                  | Y                     |
| <b>Totals</b>   | 844                          | 29                     | 11                               | 804               | 729                              |                                       |                       |

#### **IV. Subscriber Loops – Transmission**

Rule 25-4.072(1), F.A.C., Transmission Requirements states:

Telecommunications companies shall furnish and maintain the necessary plant, equipment, and facilities to provide modern, adequate, sufficient, and efficient transmission of communications between customers in their service areas. Transmission parameters shall conform to ANSI/IEEE Standard 820 Telephone Loop Performance Characteristics (Adopted 1984) incorporated herein by reference.

Staff performs transmission tests as recommended by the ANSI/IEEE Standard 820-1984. The tests measure loop current, decibel loss, power influence, metallic noise, and balance. The loop is the facility that runs from the customer's house to the telecommunications company's office and equipment. The measurements recommended by the ANSI/IEEE Standard 820-1984 are transmission characteristics of the loop that indicate acceptable performance criteria. Staff performs subscriber loop measurements during service evaluations to verify that industry standards are being met. Any loops that are considered unsatisfactory should be referred to maintenance for repair.

Staff tested 497 customer loops in the Cherry Lake, Greenville, Lee, Madison and Marianna exchanges. The results, found in Table 6, indicate all 497 loops were categorized as satisfactory. The overall subscriber loop evaluation is 100 percent. Table 6 contains the results for each exchange for the 2007 test year. In 2005, the transmission percentages were 100 percent.

| <b>Table 6 Subscriber Loops – Transmission</b> |                           |                       |                |                     |                |                      |
|--|---------------------------|-----------------------|----------------|---------------------|----------------|----------------------|
| <b>Exchange</b>                                | <b>Total Loops Tested</b> | <b>Unsatisfactory</b> |                | <b>Satisfactory</b> |                | <b>98% Std. Met?</b> |
|  |                           | <b>Number</b>         | <b>Percent</b> | <b>Number</b>       | <b>Percent</b> |                      |
| Cherry Lake                                    | 100                       | 0                     |                | 100                 | 100%           | <b>Y</b>             |
| Greenville                                     | 100                       | 0                     |                | 100                 | 100%           | <b>Y</b>             |
| Lee  | 100                       | 0                     |                | 100                 | 100%           | <b>Y</b>             |
| Madison  | 96                        | 0                     |                | 96                  | 100%           | <b>Y</b>             |
| Marianna                                       | 101                       | 0                     |                | 101                 | 100%           | <b>Y</b>             |
| <b>Company Total</b>                           | <b>497</b>                | <b>0</b>              |                | <b>497</b>          | <b>100.0%</b>  |                      |

## V. Repair Service Summary

Rule 25-4.070(1), F.A.C., Customer Trouble Reports states:

Each telecommunications company shall make all reasonable efforts to minimize the extent and duration of trouble conditions that disrupt or affect customer telephone service. Trouble reports will be classified as to their severity on a service interruption (synonymous with out-of-service or OOS) or service affecting (synonymous with Non-Out-Of-Service or non-OOS) basis. Service interruption reports shall not be downgraded to a service affecting report; however, a service affecting report shall be upgraded to a service interruption if changing trouble conditions so indicate.

Service interruptions include conditions such as no dial tone or not being able to originate a phone call. Service affecting troubles include conditions such as noise on the line or the telephone ringing when no one is on the line.

Staff reviewed 1,806 trouble reports in the Alford, Cherry Lake, Cottondale, Grand Ridge, Greenwood, Greenville, Lee, Madison, Malone, Marianna, and Sneads exchanges. Sixty-ninety reports were excluded from the evaluation. Staff excluded reports if they concerned unregulated

features, such as voice mail, or if the customer canceled the trouble call. Of the remaining 1,737 reports reviewed, 1,538 reports were out-of-service reports and 199 reports were service-affecting reports. As stated in the Availability of Service section of this report, all the exchanges had less than 50,000 access lines; therefore, the second quarter of 2007 was reviewed.

**A. Out-of-Service Restored Within 24 Hours**

Rule 25-4.070(3)(a), F.A.C., Customer Trouble Reports states:

Service Interruption: Restoration of interrupted service shall be scheduled to insure at least 95 percent shall be cleared within 24 hours of the report in each exchange that contains at least 50,000 lines and will be measured on a monthly basis. For exchanges that contain less than 50,000 lines, the results can be aggregated on a quarterly basis. For any exchange failing to meet this objective, the company shall provide an explanation with its periodic report to the Commission.

Staff reviewed 135 out-of-service reports for the Alford exchange with 135 cleared within 24 hours. The result was 100 percent. This exchange contains less than 50,000 access lines and staff aggregated the results. The Alford exchange met the service standard for the second quarter of 2007.

For the Cherry Lake exchange, staff reviewed 106 out-of-service reports with 104 reports cleared within 24 hours. The exchange's results were 98.1 percent. The Cottondale exchange had all 70 reports cleared within 24 hours. The other eight exchanges, Grand Ridge, Greenwood, Greenville, Lee, Madison, Malone, Marianna and Sneads also contained less than 50,000 access lines and required the out-of-service reports to be analyzed on a quarterly basis. Table 7, Out-of-Service Reports, contains the number of reports reviewed and cleared within 24 hours. The Lee and Marianna exchanges failed to meet the 95 percent standard with 94.7 percent and 94.3 percent, respectively. Nine of the eleven exchanges exceeded the standard which is markedly better than five of six exchanges failing to meet the standard in 2005.

| <b>Table 7 Out-of-Service Reports Restored Within 24 Hours 2<sup>nd</sup> Quarter 2007</b> |                    |                                       |                                |                      |
|--|--------------------|---------------------------------------|--------------------------------|----------------------|
| <b>Exchange</b>  | <b>OOS Reports</b> | <b>Reports Cleared within 24 hrs.</b> | <b>% Cleared within 24 hrs</b> | <b>95% Std. Met?</b> |
| Alford   | 135                | 135                                   | 100%                           | Y                    |
| Cherry Lake  | 106                | 104                                   | 98.1%                          | Y                    |
| Cottondale   | 70                 | 70                                    | 100%                           | Y                    |
| Grand Ridge  | 204                | 199                                   | 97.5%                          | Y                    |
| Greenwood  | 57                 | 55                                    | 96.5%                          | Y                    |
| Greenville   | 88                 | 86                                    | 97.7%                          | Y                    |
| Lee  | 76                 | 72                                    | 94.7%                          | N                    |
| Madison  | 207                | 199                                   | 96.1%                          | Y                    |
| Malone   | 67                 | 67                                    | 100%                           | Y                    |
| Marianna   | 421                | 397                                   | 94.3%                          | N                    |
| Sneads   | 107                | 107                                   | 100.0%                         | Y                    |
| <b>Total</b>   | <b>1538</b>        | <b>1491</b>                           |                                |                      |

**B. Service Affecting Restored Within 72 Hours**

Rule 25-4.070(3)(b), F.A.C., Customer Trouble Reports states:

Service Affecting: Clearing of service affecting trouble reports shall be scheduled to insure at least 95 percent of such reports are cleared within 72 hours of the report in each exchange, which contains at least 50,000 lines and will be measured on a monthly basis. For exchanges, which contain less than 50,000 lines, the results can be aggregated on a quarterly basis.

In the service-affecting category, staff reviewed 199 repair tickets for all eleven exchanges. Table 8 below details the results by exchange. In the Alford exchange, all 23 service-affecting reports were cleared within 72 hours. The Cherry Lake exchange had 12 service affecting reports reviewed but only six were cleared within 72 hours. Fourteen service-affecting reports were reviewed for the Cottondale exchange with 12 reports cleared within 72 hours.

The Grand Ridge exchange's 29 service-affecting reports only had one report that was not cleared within 72 hours. This results in a 96.6 percent clearance of the service affecting reports, which is above the 95 percent standard. The Greenwood exchange had ten service affecting reports; all the reports were cleared within 72 hours. Twelve service-affecting reports were

reviewed for the Greenville exchange with 11 completed within 72 hours. The Lee exchange had 20 service affecting reports reviewed with 15 cleared within 72 hours. Malone cleared all nine of its reports while Marianna and Sneads cleared 88.1 percent and 53.8 percent of the service affecting reports. Overall, the percentages were better than the service affecting percentages from the 2005 evaluation.

Embarq’s response states “it is challenging to meet the standard for repairs associated with non-out-of-service conditions especially when inclement weather is a factor. Furthermore, in small rural exchanges if only one or two repairs are not completed with 72-hours, the standard cannot be achieved as is predominately the case with exchanges identified in staff’s report as missing the standard.”

| <b>Exchange</b> | <b>SA Reports</b> | <b>Reports Cleared within 72 hrs.</b> | <b>% Cleared within 72 hrs</b> | <b>95% Std. Met?</b> |
|-----------------|-------------------|---------------------------------------|--------------------------------|----------------------|
| Alford          | 23                | 23                                    | 100%                           | Y                    |
| Cherry Lake     | 12                | 6                                     | 50%                            | N                    |
| Cottdonale      | 14                | 12                                    | 85.7%                          | N                    |
| Grand Ridge     | 29                | 28                                    | 96.6%                          | Y                    |
| Greenwood       | 10                | 10                                    | 100%                           | Y                    |
| Greenville      | 12                | 11                                    | 91.7%                          | N                    |
| Lee             | 20                | 15                                    | 75%                            | N                    |
| Madison         | 15                | 12                                    | 80%                            | N                    |
| Malone          | 9                 | 9                                     | 100%                           | Y                    |
| Marianna        | 42                | 37                                    | 88.1%                          | N                    |
| Sneads          | 13                | 7                                     | 53.8%                          | N                    |
| <b>Total</b>    | <b>199</b>        | <b>170</b>                            |                                |                      |

**C. Rebates**

Rule 25-4.070(1)(b), F.A.C., Customer Trouble Reports states:

In the event a subscriber’s service is interrupted other than by a negligent or willful act of the subscriber and it remains out of service in excess of 24 hours after being reported to the company, an appropriate adjustment or refund shall be made to the subscriber automatically, pursuant to Rule 25-4.110, F.A.C., (Customer Billing). Service interruption time will be computed on a

continuous basis, Sundays and holidays included. Also, if the company finds that it is the customer's responsibility to correct the trouble, it must notify or attempt to notify the customer within 24 hours after the trouble was reported.

In reviewing the out-of-service reports for all exchanges, staff also ensures that rebates are being automatically credited to customers for their service being interrupted for longer than 24 hours. The rebates are reviewed by month instead of by quarter. Each month, identified in Table 9 below includes the rebates due for all exchanges. Table 9 also shows the number of rebates due for each month and the rebates that were automatically given. Embarq's rebate percentages were 100 percent for April, May and June 2007. During the 2005 evaluation, Embarq failed to meet the rebate standards in the third quarter with results of 93.9, 96.5, and 92.2 for July, August, and September, respectively.

| <b>Table 9 Rebates</b> |                    |                      |                |                       |
|------------------------|--------------------|----------------------|----------------|-----------------------|
| <b>Month</b>           | <b>Rebates Due</b> | <b>Rebates Given</b> | <b>% Given</b> | <b>100% Std. Met?</b> |
| Apr - 07               | 11                 | 11                   | 100%           | <b>Y</b>              |
| May - 07               | 21                 | 21                   | 100%           | <b>Y</b>              |
| Jun - 07               | 33                 | 33                   | 100%           | <b>Y</b>              |
| Company Total          | 65                 | 65                   | 100%           |                       |

## **VI. Periodic Report Review**

Rule 25-4.0185, F.A.C., Periodic Reports states:

Each local exchange telecommunications company shall file with the Commission's Division of Competitive Markets and Enforcement the information required by Commission Form PSC/CMP 28 (4/05), which is incorporated into this rule by reference.

During an evaluation, staff compares the periodic report filed by the company to the results of the service evaluation. Staff reviews:

- Schedule 2, 11, 15, and 16 of the periodic report:
- Schedule 2 is Availability of Service
- Schedule 11 is Repair Service
- Schedule 15 is Repair Service Answer Time
- Schedule 16 is Business Office Answer Time.

Staff typically reconciles the schedules with the evaluation data collected. For example, if answer time calls were conducted in February, staff will review schedules 15 and 16 that were filed by Embarq for the month of February. Table 10 contains the reconciliation of the service evaluation results for answer time, availability of service, and repair within the 24 and 72-hour intervals with Embarq's filed reports. There was a difference of ten items. Staff also verifies whether the reports are forwarded in a timely manner. Embarq did file its periodic report on time. In its response to the report draft, Embarq states "given the differences in data supporting the periodic reports and the samples used in the evaluation, deviations may be expected."

| <b>Table 10 Periodic Report Review</b>                             |                       |                                |                                     |                                   |
|--|-----------------------|--------------------------------|-------------------------------------|-----------------------------------|
| <b>Item Reviewed</b>   | <b>Exchange</b>       | <b>Month</b>                   | <b>Std. Met per Periodic Report</b> | <b>Std. Met per Service Eval.</b> |
| <b>Answer Time</b><br>Business Office<br>Repair Service            |                       | April 2007                     | Y                                   | Y                                 |
|  |                       | April 2007                     | Y                                   | Y                                 |
| <b>Availability of Service</b>                                     | Alford                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Cherry Lake           | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Cottdale              | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Grand Ridge           | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenwood             | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenville            | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Lee                   | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Madison               | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Malone                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Marianna              | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Sneads                | 2nd Qtr 2007                   | Y                                   | Y                                 |
| <b>Repair Service – OOS 24 Hours</b>                               | Alford                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Cherry Lake           | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Cottdale              | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Grand Ridge           | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenwood             | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenville            | 2nd Qtr 2007                   | N                                   | Y                                 |
|  | Lee                   | 2nd Qtr 2007                   | N                                   | N                                 |
|  | Madison               | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Malone                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Marianna              | 2nd Qtr 2007                   | N                                   | N                                 |
|  | Sneads                | 2nd Qtr 2007                   | Y                                   | Y                                 |
| <b>Repair Service – SA 72 Hours</b>                                | Alford                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Cherry Lake           | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Cottdale              | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Grand Ridge           | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenwood             | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Greenville            | 2nd Qtr 2007                   | N                                   | N                                 |
|  | Lee                   | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Madison               | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Malone                | 2nd Qtr 2007                   | Y                                   | Y                                 |
|  | Marianna              | 2nd Qtr 2007                   | Y                                   | N                                 |
|  | Sneads                | 2nd Qtr 2007                   | Y                                   | N                                 |
| <b>Comparison between Periodic Report &amp; Service Evaluation</b> | <b>Items Reviewed</b> | <b>Items that are the Same</b> | <b>Items that are Different</b>     | <b>% of Same Items</b>            |
|  | 35                    | 25                             | 10                                  | 71.4%                             |



## VII. Safety – Ground Deficiencies

Rule 25-4.038, F.A.C., Safety states:

Each utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities. All subscriber loops shall be properly installed to prevent harm to the public as referenced in Article 800.30 and 800.31 of the National Electric Code (NEC), incorporated herein by reference.

The National Electric Code provides specific guidance about grounding telephone systems. Proper grounding of the subscriber loop helps protect the subscribers and their property.

Staff tested 497 loops in the five exchanges during the 2007 service evaluation. During the inspection, 486 station grounds were verified. Seventy of the station grounds were associated with new installations for service and 416 station grounds were randomly tested. As Table 11 indicates, one of the new service installation grounds in the Lee Exchange had a poor ground. Fifteen of the randomly selected station grounds had poor grounds with eleven located within the Cherry Lake exchange. For the new service installations, the standard is 100 percent for station grounds and 92 percent for randomly inspected station grounds. The overall results for proper grounding were better than the results observed during the 2005 evaluation. Embarq’s response indicates that “dry sandy soil conditions were the primary cause of the deficiencies identified during the service evaluation.”

| <b>Exchange</b>     | <b>Loops Tested</b> | <b>Poor Ground:</b> | <b>Adequate</b> | <b>Std. Met?</b> |
|---------------------|---------------------|---------------------|-----------------|------------------|
| <b>New Installs</b> |                     |                     |                 |                  |
| Cherry Lake         | 4                   | 0                   | 100%            | Y                |
| Greenville          | 7                   | 0                   | 100%            | Y                |
| Lee                 | 11                  | 1                   | 90.9%           | N                |
| Madison             | 22                  | 0                   | 100%            | Y                |
| Marianna            | 26                  | 0                   | 100%            | Y                |
| Company Total       | 70                  | 1                   |                 |                  |
| <b>Random Loops</b> |                     |                     |                 |                  |
| Cherry Lake         | 96                  | 11                  | 88.5%           | N                |
| Greenville          | 93                  | 0                   | 100%            | Y                |
| Lee                 | 89                  | 2                   | 97.8%           | Y                |
| Madison             | 78                  | 1                   | 98.7%           | Y                |
| Marianna            | 60                  | 1                   | 98.3%           | Y                |
| Company Total       | 416                 | 15                  |                 |                  |

## **VIII. Timing and Billing Accuracy**

### **A. Intra-LATA 1+ and Calling Card**

Rule 25-4.077 (3), F.A.C., Metering and Recording Equipment states:

Metering and timing equipment shall be maintained so that the accuracy of the company billing operations enjoys a high confidence level from their customers. After allowance for a one-second variation, timing accuracy shall be not less than 97 percent.

A series of test calls are generated to measure the timing of local toll calls or Intra-LATA calls for billing purposes. These tests are precisely timed to ensure that the elapsed times are the same for each series of calls. To evaluate the accuracy of a company's network, all test calls are completed using our computerized timing tester. Normally, 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 are analyzed and compared to the records generated by the tests for origination and duration time 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.

Staff did not make Intra-LATA 1+ or calling card test calls over Embarq's network. Embarq does not provide calling card services. Embarq Communications handles the Intra-LATA long distance traffic for Embarq Florida. Therefore, the long distance service assigned to the Embarq test line did not differentiate between Intra-LATA and Inter-LATA calls. The billing for the Inter-LATA calls indicated no problem and the service was billed per tariff.

### **B. Directory Assistance**

Rule 25-4.115, F.A.C., Directory Assistance states:

(1) Directory assistance service provided by any telephone company shall be subject to the following:

(a) Charges for directory assistance shall be reflected in tariffs filed with the Commission and shall apply to the end user.

(b) The tariff shall state the number of telephone numbers that may be requested by a customer per directory assistance call.

(2) Charges for calls within a local calling area or within a customer's Home Numbering Plan Area (HNPA) shall be at rates prescribed in the general service tariff of the local exchange company originating the call and shall be subject to the following:

(a) There shall be no charge for directory assistance calls from lines or trunks serving individuals with disabilities. . . .

(b) The same charge shall apply for calls within a local calling area and calls within an HNPA.

(c) The tariff shall state the number of calls per billing month per individual line or trunk to the number designated for local directory assistance (i.e., 411, 311, or 611) for which no charge will apply. The local exchange company shall charge for each local directory assistance call in excess of this allowance. . . .

Staff conducted directory assistance (DA) testing on two lines. One line was designated as a TDD line or a line for an individual with disabilities. Embarq did not charge for the calls made on the TDD line, which is correct. On the other line, staff made seventy-eight calls. According to Embarq’s tariff, there are no allowances. Therefore, the billable directory assistance calls are seventy-eight calls which were billed. The result is 100 percent, which is above the standard of 97 percent.

The bills for the DA calls charged \$0.55 per call which conformed to the Directory listing as well as Embarq’s tariff. As Table 12 indicates, Embarq met the billing accuracy standard, and our analysis showed the company was billing per tariff.

| <b>Central Office</b> | <b>Telephone Number</b> | <b>Calls Made</b> | <b>Allowance</b> | <b>Billable Calls</b> | <b>Calls Billed</b> | <b>Variance</b> | <b>Percent Correctly Billed</b> | <b>97 % Std. Met?</b> | <b>Billed per Tariff</b> |
|-----------------------|-------------------------|-------------------|------------------|-----------------------|---------------------|-----------------|---------------------------------|-----------------------|--------------------------|
| Madison               | 850-973 - 4885          | 78                | 0                | 78                    | 78                  | 0               | 100%                            | <b>Y</b>              | <b>Y</b>                 |
| Marianna              | 850-482- 8755           | 50                | ALL - TDD        | 0                     | 0                   | 0               | 100%                            | <b>Y</b>              | <b>Y</b>                 |

## **IX. 9-1-1 Emergency Service**

Rule 25-4.081(1), F.A.C., Emergency 911 Access states:

Access to emergency 911 services shall be provided by the local exchange company to basic local exchange company subscribers.

From the Marianna exchange, staff made 150 voice calls and 51 TDD calls to 911 emergency services. For the TDD calls, there were several instances where calls appeared to be answered but the operators did not respond to the prompts. The TDD would indicate “Ringing” and then show “Sending Auto ID” indicating the call had been answered but no response was received from the 911 Center. Therefore, staff concluded all 51 calls were completed to the 911 Center. The results of the testing were reported to the State 911 Coordinator.

| <b>Table 13 911 Emergency Service</b> |            |                   |                   |                     |                        |                             |                        |
|---------------------------------------|------------|-------------------|-------------------|---------------------|------------------------|-----------------------------|------------------------|
| <b>Area</b>                           | <b>NXX</b> | <b>Calls Made</b> | <b>Busy Calls</b> | <b>Failed Calls</b> | <b>Calls Completed</b> | <b>% of Calls Completed</b> | <b>100 % Std. Met?</b> |
| <b>Voice Calls</b>                    |            |                   |                   |                     |                        |                             |                        |
| Madison                               | 490        | 150               | 0                 | 0                   | 150                    | 100%                        |                        |
| Company Total                         |            | 150               | 0                 | 0                   | 150                    | 100%                        | <b>Y</b>               |
| <b>TDD Calls</b>                      |            |                   |                   |                     |                        |                             |                        |
| Madison                               | 490        | 51                | 0                 | 0                   | 51                     | 100%                        |                        |
| Company Total                         |            | 51                | 0                 | 0                   | 51                     | 100%                        | <b>Y</b>               |

## **X. Service Guarantee Program (SGP) Rebates**

Rule 25-4.085, F.A.C., Service Guarantee Program states:

A company may petition the Commission for approval of a Service Guarantee Program, which would relieve the company from the rule requirement of each service standard addressed in the approved Service Guarantee Program. When evaluating a Service Guarantee Program for approval, the Commission will consider the Program's benefits to the customers and whether the Program is in the public interest. The Commission shall have the right to enforce the provisions of the Service Guarantee Plan.

Docket Number 050918-TL allows Embarq to operate under a Service Guarantee Program (SGP), which includes a limited waiver of rules pertaining to the Availability of Service (Installations) and Repair of Service. While the SGP is in affect, the Commission has the authority to ensure service is adequate and reasonable. Embarq's SGP includes plans for giving rebates to customers for missed installations and out-of-service conditions outlined in the docket.

### **A. Installation SGP Rebates**

Pursuant to Docket No. 050918-TL, Embarq committed to supplemental service quality requirements. These measures were instituted to improve service installation and repair intervals. The Commission granted the request which calls for customers to receive an automatic credit of \$25.00 when Embarq fails to install the residential service within three days or on the date agreed upon with the customer, otherwise known as the commitment date. Where Embarq is offering a commitment date greater than three days and the customer requests an earlier date, the SGP credit will be based on the customer requested date, or on three days, whichever is greater.

While reviewing the service orders for the evaluation, staff also determined if SGP rebates were due to customers. In the eleven exchanges reviewed, staff found twenty-eight SGP credits that were due. Table 14 shows the SGP credits due by month for each exchange. Embarq states in its response "as demonstrated during the service evaluation, the automated functionality of the

SGP system worked appropriately as designed. The four misses scored by staff during the evaluation were attributable to insufficient notations on the subject service orders to support a revised due date entry and exclusion due to construction of facilities.”

## **B. Out-of-Service SGP Rebates**

Embarq’s SGP states that when Embarq fails to complete an out-of-service repair within 24 hours from the time the report is received, the customer will receive an automatic credit. The amount of credit will be \$11.00. For service outages greater than 48 hours but less than five days, the credit will be \$15. Service outages greater than five days warrant a \$40.00 credit. The SGP credits only apply to the primary residential local service.

During the repair ticket review, staff found ten SGP rebates that were due for the month of April and that ten SGP rebates were also due for May 2007. For June 2007, staff found that 29 rebates were due to customers. During the review, both Embarq and Commission staff agreed one report in the Madison exchange should have been coded as an OOS condition and receive an SGP rebate. Embarq corrected the matter and issued the credit to the customer's account on January 23, 2008. Table 15 shows the credits due by month for each exchange. Cherry Lake, Greenville, and Malone did not have any rebates due.

In addition, Docket No. 050918-TL states that Embarq will achieve “90% of out-of-service conditions repaired within each calendar quarter in 90% of the small exchanges (exchanges less than 50,000 access lines). No exchange shall miss the 90% objective for more than two (2) consecutive months.” The supplemental information provided by Embarq is provided for the eleven exchanges evaluated. None of the exchanges had two consecutive months that were below the 90% objective:

| <b>Table 14 Installation SGP Rebates</b> |                      |                    |                      |                |
|--|----------------------|--------------------|----------------------|----------------|
| <b>Month</b>                             | <b>Exchange</b>      | <b>Rebates Due</b> | <b>Rebates Given</b> | <b>% Given</b> |
| <b>Apr-2007</b>                          | Alford               | 0                  | 0                    |                |
|  | Cherry Lake          | 0                  | 0                    |                |
|  | Cottdale             | 1                  | 1                    | 100%           |
|  | Grand Ridge          | 0                  | 0                    |                |
|  | Greenville           | 5                  | 5                    | 100%           |
|  | Greenwood            | 0                  | 0                    |                |
|  | Lee                  | 2                  | 2                    | 100%           |
|  | Madison              | 8                  | 7                    | 87.5%          |
|  | Malone               | 1                  | 1                    | 100%           |
|  | Marianna             | 0                  | 0                    |                |
|  | Sneads               | 0                  | 0                    |                |
|  | <b>Company Total</b> | <b>17</b>          | <b>16</b>            | <b>94.1%</b>   |
| <b>May-2007</b>                          | Alford               | 0                  | 0                    |                |
|  | Cherry Lake          | 3                  | 2                    | 66.7%          |
|  | Cottdale             | 0                  | 0                    |                |
|  | Grand Ridge          | 0                  | 0                    |                |
|  | Greenville           | 2                  | 2                    | 100%           |
|  | Greenwood            | 0                  | 0                    |                |
|  | Lee                  | 2                  | 1                    | 50%            |
|  | Madison              | 0                  | 0                    |                |
|  | Malone               | 0                  | 0                    |                |
|  | Marianna             | 0                  | 0                    |                |
|  | Sneads               | 0                  | 0                    |                |
|  | <b>Company Total</b> | <b>7</b>           | <b>5</b>             | <b>71.4%</b>   |
| <b>June-2007</b>                         | Alford               | 0                  | 0                    |                |
|  | Cherry Lake          | 0                  | 0                    |                |
|  | Cottdale             | 0                  | 0                    |                |
|  | Grand Ridge          | 0                  | 0                    |                |
|  | Greenville           | 0                  | 0                    |                |
|  | Greenwood            | 1                  | 1                    | 100%           |
|  | Lee                  | 1                  | 1                    | 100%           |
|  | Madison              | 2                  | 1                    | 50%            |
|  | Malone               | 0                  | 0                    |                |
|  | Marianna             | 0                  | 0                    |                |
|  | Sneads               | 0                  | 0                    |                |
|  | <b>Company Total</b> | <b>4</b>           | <b>3</b>             | <b>75.0%</b>   |

| <b>Table 15 Out of Service SGP Rebates</b> |                      |                    |                      |                |
|--|----------------------|--------------------|----------------------|----------------|
| <b>Month</b>                               | <b>Exchange</b>      | <b>Rebates Due</b> | <b>Rebates Given</b> | <b>% Given</b> |
| <b>Apr - 07</b>                            | Alford               | 1                  | 1                    | 100%           |
|  | Cherry Lake          | 0                  | 0                    |                |
|  | Cottdale             | 0                  | 0                    |                |
|  | Grand Ridge          | 1                  | 1                    | 100%           |
|  | Greenwood            | 1                  | 1                    | 100%           |
|  | Greenville           | 0                  | 0                    |                |
|  | Lee                  | 0                  | 0                    |                |
|  | Madison              | 2                  | 2                    | 100%           |
|  | Malone               | 0                  | 0                    |                |
|  | Marianna             | 5                  | 5                    | 100%           |
|  | Sneads               | 0                  | 0                    |                |
|  | <b>Company Total</b> |                    | <b>10</b>            | <b>10</b>      |
| <b>May - 07</b>                            | Alford               | 0                  | 0                    |                |
|  | Cherry Lake          | 0                  | 0                    |                |
|  | Cottdale             | 0                  | 0                    |                |
|  | Grand Ridge          | 0                  | 0                    |                |
|  | Greenwood            | 0                  | 0                    |                |
|  | Greenville           | 0                  | 0                    |                |
|  | Lee                  | 1                  | 1                    | 100%           |
|  | Madison              | 3                  | 3                    | 100%           |
|  | Malone               | 0                  | 0                    |                |
|  | Marianna             | 14                 | 14                   | 100%           |
|  | Sneads               | 6                  | 6                    | 100%           |
|  | <b>Company Total</b> |                    | <b>24</b>            | <b>24</b>      |
| <b>Jun - 07</b>                            | Alford               | 1                  | 1                    | 100%           |
|  | Cherry Lake          | 0                  | 0                    |                |
|  | Cottdale             | 2                  | 2                    | 100%           |
|  | Grand Ridge          | 3                  | 3                    | 100%           |
|  | Greenwood            | 1                  | 1                    | 100%           |
|  | Greenville           | 0                  | 0                    |                |
|  | Lee                  | 5                  | 5                    | 100%           |
|  | Madison              | 4                  | 3                    | 75%            |
|  | Malone               | 0                  | 0                    |                |
|  | Marianna             | 13                 | 13                   | 100%           |
|  | Sneads               | 0                  | 0                    |                |
|  | <b>Company Total</b> |                    | <b>29</b>            | <b>28</b>      |

| <b>Table 16 Small Exchanges OOS Percentages – 2<sup>nd</sup> Quarter 2007</b> |            |          |           |
|---|------------|----------|-----------|
|   | April 2007 | May 2007 | June 2007 |
| <b>Exchanges</b>  |            |          |           |
| Alford  | 93.5%      | 100%     | 96.8%     |
| Cherry Lake   | 100%       | 100%     | 96.6%     |
| Cottdale  | 100%       | 100%     | 100%      |
| Grand Ridge   | 97.8%      | 100%     | 95.9%     |
| Greenville  | 88.5%      | 100%     | 97.7%     |
| Greenwood   | 100%       | 100%     | 100%      |
| Lee   | 100%       | 91.7%    | 88.5%     |
| Malone  | 100%       | 100%     | 100%      |
| Madison   | 93.5%      | 95.8%    | 96.6%     |
| Marianna  | 95.8%      | 95.1%    | 92.7%     |
| Sneads  | 100%       | 100%     | 100%      |

## **XI. SGP Answer Time**

Rule 25-4.085, F.A.C., Service Guarantee Program, which was quoted in the Service Guarantee Program (SGP) Rebates section, applies to this section, also. In Docket No. 050490-TL, where Embarq fails to meet the answer time measurement, it will credit the Lifeline Community Service Fund (the Fund). Embarq will credit the Fund \$2,000 if the Average Speed of Answer (ASA) is greater than 50 seconds. The penalty increases to \$5,000 if the ASA is above 60 seconds and \$7,000 if it is above 70 seconds.

All of staff's answer time test calls were conducted in September 2007. The results of the answer time test calls show Embarq achieved 98.7 percent for the business office and 99.3 percent for the repair center. The ASA for the business office observed by staff was 15.8 seconds and 15.0 seconds for the repair office.

## **XII. SGP Report Review**

Rule 25-4.085, F.A.C., Service Guarantee Program applies to this section, also. The SGP is outlined in Docket No. 050490-TL and accordingly, Embarq provided quarterly reports detailing the amount of SGP credits that were given. Table 16 shows the results of staff's reconciliation of the evaluation results and Embarq's filed SGP reports. There was a difference of fourteen items. Staff also reviews whether the SGP reports are forwarded in a timely manner. Embarq did file its SGP reports on time. In response to the report draft Embarq states "due to differences in data collection cut off dates, differences in data supporting the SGP reports and the scoring parameters used in the evaluation, deviations may be expected."



| <b>Table 17 SGP Report Review</b> |              |                 |                     |                   |
|-----------------------------------|--------------|-----------------|---------------------|-------------------|
| <b>Category</b>                   | <b>Month</b> | <b>Exchange</b> | <b>SGP Credited</b> |                   |
|                                   |              |                 | <b>SGP Report</b>   | <b>Ser. Eval.</b> |
| <b>Installation Credits</b>       | Apr- 07      | Alford          | N                   | N                 |
|                                   |              | Cherry Lake     | N                   | N                 |
|                                   |              | Cottdale        | <b>N</b>            | <b>Y</b>          |
|                                   |              | Grand Ridge     | N                   | N                 |
|                                   |              | Greenwood       | N                   | N                 |
|                                   |              | Greenville      | Y                   | Y                 |
|                                   |              | Lee             | Y                   | N                 |
|                                   |              | Madison         | Y                   | Y                 |
|                                   |              | Malone          | Y                   | Y                 |
|                                   |              | Marianna        | N                   | N                 |
|                                   | Sneads       | N               | N                   |                   |
|                                   | May - 07     | Alford          | N                   | N                 |
|                                   |              | Cherry Lake     | <b>Y</b>            | <b>N</b>          |
|                                   |              | Cottdale        | N                   | N                 |
|                                   |              | Grand Ridge     | N                   | N                 |
|                                   |              | Greenville      | Y                   | Y                 |
|                                   |              | Greenwood       | N                   | N                 |
|                                   |              | Lee             | <b>N</b>            | <b>Y</b>          |
|                                   |              | Madison         | N                   | N                 |
|                                   |              | Malone          | N                   | N                 |
|                                   |              | Marianna        | N                   | N                 |
|                                   | Sneads       | N               | N                   |                   |
|                                   | Jun - 07     | Alford          | N                   | N                 |
|                                   |              | Cherry Lake     | N                   | N                 |
|                                   |              | Cottdale        | N                   | N                 |
|                                   |              | Grand Ridge     | N                   | N                 |
|                                   |              | Greenville      | N                   | N                 |
| Greenwood                         |              | Y               | Y                   |                   |
| Lee                               |              | <b>N</b>        | <b>Y</b>            |                   |
| Madison                           |              | <b>Y</b>        | <b>N</b>            |                   |
| Malone                            |              | N               | N                   |                   |
| Marianna                          |              | N               | N                   |                   |
| Sneads                            | N            | N               |                     |                   |

| <b>Table 17 SGP Report Review – continued</b>        |                       |                                |                                 |                        |
|--|-----------------------|--------------------------------|---------------------------------|------------------------|
| <b>Category</b>                                      | <b>Month</b>          | <b>Exchange</b>                | <b>SGP Credited</b>             |                        |
|  |                       |                                | <b>SGP Report</b>               | <b>Ser. Eval.</b>      |
| <b>Out-of-Service Credits</b>                        | Apr – 07              | Alford                         | Y                               | Y                      |
|  |                       | Cherry Lake                    | N                               | N                      |
|  |                       | Cottdale                       | N                               | N                      |
|  |                       | Grand Ridge                    | Y                               | Y                      |
|  |                       | Greenville                     | Y                               | N                      |
|  |                       | Greenwood                      | N                               | Y                      |
|  |                       | Lee                            | N                               | N                      |
|  |                       | Madison                        | Y                               | Y                      |
|  |                       | Malone                         | N                               | N                      |
|  |                       | Marianna                       | Y                               | Y                      |
|  | Sneads                | Y                              | N                               |                        |
|  | May - 07              | Alford                         | Y                               | N                      |
|  |                       | Cherry Lake                    | N                               | N                      |
|  |                       | Cottdale                       | Y                               | N                      |
|  |                       | Grand Ridge                    | Y                               | N                      |
|  |                       | Greenville                     | N                               | N                      |
|  |                       | Greenwood                      | N                               | N                      |
|  |                       | Lee                            | Y                               | Y                      |
|  |                       | Madison                        | Y                               | Y                      |
|  |                       | Malone                         | Y                               | N                      |
|  |                       | Marianna                       | Y                               | Y                      |
|  | Sneads                | Y                              | Y                               |                        |
|  | Jun – 07              | Alford                         | Y                               | Y                      |
|  |                       | Cherry Lake                    | N                               | N                      |
|  |                       | Cottdale                       | Y                               | Y                      |
|  |                       | Grand Ridge                    | Y                               | Y                      |
|  |                       | Greenwood                      | N                               | Y                      |
|  |                       | Greenville                     | Y                               | Y                      |
|  |                       | Lee                            | Y                               | Y                      |
|  |                       | Madison                        | Y                               | Y                      |
| Malone   |                       | N                              | N                               |                        |
| Marianna   |                       | Y                              | Y                               |                        |
| Sneads   | Y                     | N                              |                                 |                        |
| <b>Comparison between SGP Report &amp; Ser Eval.</b> | <b>Items Reviewed</b> | <b>Items that are the Same</b> | <b>Items that are Different</b> | <b>% of Same Items</b> |
|  | <b>66</b>             | <b>52</b>                      | <b>14</b>                       | <b>78.8%</b>           |

### XIII. Company's Response to Draft

Voice | Data | Internet | Wireless | Entertainment

April 17, 2008

Rick Moses, Chief  
Bureau of Telecommunication Service Quality,  
Certification & Enforcement  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0866

RE: Embarq Florida, Inc. - 2007 Service Quality Evaluation

Dear Mr. Moses:

Thank you for the opportunity to comment on the draft Service Quality Evaluation results. We are in general agreement with Staff's data and analyses. Below are our comments concerning areas where the evaluation reflected errors or deviations.

**Answer Time – TDD:**

The busy conditions encountered when dialing the business office and repair appear to be the result of introducing additional calls that deviate from the norm and thus the potential to experience a line busy condition. As for the ring-no-answer conditions experienced, the cause is unknown as the TDD units are situated between two representatives so that someone is available to take a TDD call and upon reviewing the situation with the respective representatives Embarq was unable to identify what may have occurred.

**New Telephone Numbers in Directory-Within 48 Hours:**

All of the 123 listings requested by the auditors were verified as being posted to the directory assistance files within 48 hours. Staff listed 4 misses in the draft with two of them subsequently explained to staff's satisfaction and thus are no longer considered misses. In one instance, within 48 hours the service was disconnected at the customer's request; therefore, the listing was not available when the test call was placed to directory assistance. In the other situation, two access lines were installed for the subject customer, one on September 26 and the other on the 27<sup>th</sup>; therefore, two separate listings were available when staff placed the test call and one of them was provided. The remaining 2 misses were attributable to human error that occurred during the operator's search for the respective listings.

**Repair Service:**

- **OOS-24:** Pursuant to the Commission's January 2006 approval, in Docket 050918-TL, of the modifications to the SGP, effective July 1, 2006, repair of 90% of out-of-service conditions for basic residential service within 24 hours each calendar quarter on a statewide level will be achieved. Additionally, Embarq commits to repair 90% of out-of-service conditions within 24 hours each calendar quarter in 90% of the small exchanges, with no exchange missing the 90% for more than two consecutive months.



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Rick Moses, Chief  
April 17, 2008  
Page 2

- **NOOS-72:** With priority given to out-of-service repairs and service installations, it is at times challenging to meet the standard for repairs associated with non-out-of-service conditions especially when inclement weather is a factor. Furthermore, in small rural exchanges if only one or two repairs are not completed within 72-hours the standard cannot be achieved as is predominately the case with the exchanges identified in staff's report as missing the standard.

**Periodic Reports Review:**

Given the differences in data supporting the periodic reports and the samples used in the evaluation, deviations may be expected.

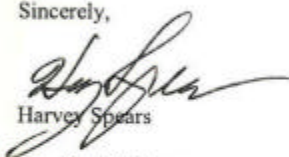
**Safety – Grounding Deficiencies:**

Of the 486 grounds verified/tested 16 were considered inadequate. The grounding deficiencies were almost all associated with existing, not recently installed, service locations. Proper connections were in place for all 16 locations; however, it was necessary to establish an additional or alternative grounding source in order to obtain an acceptable ground. Dry sandy soil conditions were the primary cause of the deficiencies identified during the service evaluation.

**Service Guarantee Program (SGP):**

- **Service Installation Credits:** As demonstrated during the service evaluation, the automated functionality of the SGP system worked appropriately as designed. The 4 misses scored by staff during the evaluation were attributable to insufficient notations on the subject service orders to support a revised due date entry and exclusion due to construction of facilities.
- **SGP Report Review:** Due to differences in data collection cut off dates, differences in data supporting the SGP reports and the scoring parameters used in the evaluation, deviations may be expected.

Sincerely,



Harvey Spears

cc: Paul Vickery  
Sandy Khazraee