



REPORT ON TARIFF COMPLIANCE

For

Frontier Communications of America, Inc.

Molino Exchange

July 30 – August 10, 2007

Division of Competitive Markets & Enforcement

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Report on Tariff Compliance

For

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Engineering Specialists of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct tariff compliance evaluations of the telecommunications services provided by Interexchange Companies (IXCs) operating within the state of Florida. Rule 25-24.485(g), Florida Administrative Code, states, "Companies shall charge only the rates contained in their tariff." This rule applies to the intra-state inter-LATA 1+ and Calling Cards test calls conducted during a tariff compliance evaluation.

The 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 tariff compliance evaluation on Frontier Communications of America, Inc. (Frontier), during the period of July 30 – August 10, 2007. The test calls were conducted at a central office of the Molino 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

During the evaluation, a series of test calls were generated to measure the timing of toll calls for billing analysis. To evaluate the accuracy of Frontier, 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 Frontier’s network to verify the timing accuracy. The test calls were made to numbers outside the Molino exchange and outside the Pensacola LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that Frontier undertimed five of the calls yielding 96.4 percent timing accuracy for 1+ calls.

Frontier stated that it uses Global Crossing as its underlying provider. Frontier depends on Global Crossing to record the calls and forward the call details to Frontier for billing. Once the call details are forwarded to Frontier, “it is almost a certainty that Global Crossing’s detailed switch records of these calls are no longer available.” Frontier could not determine the cause for the five undertimed calls.

Table 1 Inter-LATA 1+ Timing Accuracy				
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed
Timing Accuracy				
1+	139	5	0	96.4%

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. Frontier underbilled the same five calls that were undertimed. This resulted in a 96.4 percent billing accuracy.

Frontier stated that the underbilling resulted from the undertiming issue. Since this issue is about undertiming and underbilling, and there was no harm to the customers.

Table 2 Inter-LATA 1+ Billing Accuracy				
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed
Billing Accuracy				
1+	139	5	0	96.4%

III. Inter-LATA 1+ Billing per Tariff

Even though Frontier undertimed and underbilled five calls of the 139 1+ test calls, Frontier did use the timing increments and rates listed in its tariff. Staff concludes that Frontier did bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 144 calling card test calls over Frontier’s network to verify the timing accuracy. The test calls were made to numbers outside the Molino exchange and outside the Pensacola LATA utilizing Frontier’s calling card. Frontier correctly timed all of the calls, which resulted in a 100 percent timing accuracy for its calling card calls.

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
Timing Accuracy				
Calling Card	144	0	0	100%

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. Frontier billed all of the calls correctly. This resulted in a 100 percent billing accuracy.

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
Billing Accuracy				
Calling Card	144	0	0	100%

VI. Inter-LATA Calling Card Billing per Tariff

Frontier timed and billed all of the 144 calling card test calls that staff conducted using the rates and timing increments listed in its tariff. Staff concludes that Frontier billed according to its tariff.