



REPORT ON TARIFF COMPLIANCE  
For  
BellSouth Long Distance, Inc., d/b/a AT&T Long Distance  
Service  
Panama City Exchange  
*June 16 – July 23, 2008*

Division of Service, Safety & Consumer Assistance  
*December 23, 2008*

# **Report on Tariff Compliance**

**For**

## **BellSouth Long Distance, Inc., d/b/a AT&T Long Distance Service**

Engineering Specialists of the Florida Public Service Commission's Division of Service, Safety and Consumer Assistance conduct test calls of services provided by Interexchange Companies (IXCs) operating within the state of Florida. Section 364.04, Florida Statutes, states that a ". . . company shall file with the commission, and shall print and keep open to public inspection, schedules showing the rates, tolls, rentals, contracts, and charges of that company for service to be performed within the state." Florida statutes are implemented by rules and the rules that apply to IXCs are found within the Florida Administrative Code (F.A.C.) Specifically, Rule 25-24.485(g), F.A.C., states, "Companies shall charge only the rates contained in their tariff." Staff utilizes the tariff that is currently on file with the Commission during the tariff 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 on file with the Commission.

During the period of June 16 – July 23, 2008, staff performed an evaluation on BellSouth Long Distance, Inc., (AT&T). The test calls were conducted at a central office within the Panama City 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 AT&T, 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 101 1+ test calls over AT&T's network to verify timing accuracy. The test calls were made to numbers outside the Panama City exchange and outside the Panama City LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that AT&T correctly timed 99 percent of the 1+ calls. AT&T undertimed one call.

<b>Table 1 Inter-LATA 1+ Timing Accuracy</b>				
	<b>Total Number of Calls</b>	<b>Number of Calls Undertimed</b>	<b>Number of Calls Overtimed</b>	<b>Percent of Calls Correctly Timed</b>
<b>Timing Accuracy</b>				
1+	101	1	0	99%

## 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. The overall result was 99 percent billing accuracy. One call was underbilled because it was undertimed.

<b>Table 2 Inter-LATA 1+ Billing Accuracy</b>				
	<b>Total Number of Calls</b>	<b>Number of Calls Underbilled</b>	<b>Number of Calls Overbilled</b>	<b>Percent of Calls Correctly Billed</b>
<b>Billing Accuracy</b>				
1+	101	1	0	99%

## III. Inter-LATA 1+ Billing per Tariff

AT&T billed the 101 test calls with the rates and timing increments listed in the tariff. Staff concludes that AT&T did bill per tariff.

## IV. Inter-LATA Calling Card Timing Accuracy

Staff made 89 calling card test calls over AT&T's network to verify the timing accuracy. The test calls were made to numbers outside the Panama City exchange and outside the Panama City LATA utilizing AT&T's calling card. AT&T correctly timed 19 calls, which resulted in a 21.3 percent timing accuracy for the calling card calls. Seventy calls were overtimed. The calls that were overtimed were over by a minute.

<b>Table 3 Inter-LATA Calling Card Timing Accuracy</b>				
	<b>Total Number of Calls</b>	<b>Number of Calls Undertimed</b>	<b>Number of Calls Overtimed</b>	<b>Percent of Calls Correctly Timed</b>
<b>Timing Accuracy</b>				
Calling Card	89	0	70	21.3%

AT&T stated in its response to the draft report, that during a billing system conversion, AT&T “discovered that card calls, know as Travel Service, were being rounded up an additional minute as the result of a change made by its former underlying carrier.” The underlying carrier did not communicate with AT&T about this change. AT&T has corrected the problem and conducted test calls for verification. In addition, AT&T is investigating the calling card data to determine the customers affected and will be issue the necessary credits.

During testing, AT&T’s fraud protection on the calling card prevented uninterrupted testing. AT&T suggested that staff utilize a different 1-800 number to access the card. Upon receipt of the bill, a series of calls were not billed. AT&T stated that the calls that were placed over the second 1-800 number did not have the same PIC or the same platform. “[T]herefore, the calls did not appear on the AT&T Long Distance Service bill page that staff received.” AT&T did provide staff with a bill for the calls that were placed using the second 1-800 number. Staff removed those calls from the test results. Table 3 indicates the results for the single 1-800 number that was identified for the travel card being tested.

## 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. AT&T overbilled 70 calls. This resulted in a 21.3 percent billing accuracy for its calling card calls.

AT&T stated in its response to the draft report that staff did not use the current tariff when rating the calling card test calls. Staff agreed with AT&T and re-rated the calls using the current tariff page. AT&T did bill the correct rate, but because of the rounding issue mentioned in the previous section, seventy calls were overbilled. AT&T is researching the customers that were affected and will issue the appropriate credits. Table 4 displays the results.

	<b>Total Number of Calls</b>	<b>Number of Calls Underbilled</b>	<b>Number of Calls Overbilled</b>	<b>Percent of Calls Correctly Billed</b>
<b>Billing Accuracy</b>				
Calling Card	89	0	70	21.3%

## VI. Inter-LATA Calling Card Billing per Tariff

AT&T correctly billed 21.3 percent of the calling card calls. Staff concludes that AT&T billed using the rates listed in the tariff; however, the rounding issue caused the calls to be overbilled.