

REPORT ON TARIFF COMPLIANCE

For

Business Telecom, Inc. d/b/a BTI

Ocala Exchange

October 13 – November 13, 2008

Division of Service, Safety & Consumer Assistance January 6, 2009

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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 October 13 – November 13, 2008, staff performed an evaluation on Business Telecom, Inc., (BTI). The test calls were conducted at a central office within the Ocala 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 BTI, 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 128 1+ test calls over BTI's network to verify timing accuracy. The test calls were made to numbers outside the Ocala exchange and outside the Gainesville LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that BTI correctly timed 100 percent of the 1+ 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+	128	0	0	100%	

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 100 percent billing accuracy.

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+	128	0	0	100%	

III. Inter-LATA 1+ Billing per Tariff

BTI billed the 128 test calls with the rates and timing increments listed in the tariff. Staff concludes that BTI did bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 142 calling card test calls over BTI's network to verify the timing accuracy. The test calls were made to numbers outside the Ocala exchange and outside the Gainesville LATA utilizing BTI's calling card. BTI correctly timed 142 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	142	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. BTI billed 142 calls correctly resulting in 100 percent billing accuracy for its calling card calls.

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	142	0	0	100%	

VI. Inter-LATA Calling Card Billing per Tariff

BTI billed the 142 calling card test calls based upon the timing increment and rates listed in the tariff. Staff concludes that BTI did bill per tariff.