



REPORT ON TARIFF COMPLIANCE

For

NOS Communications, Inc., d/b/a Blueridge Telecom
Systems

Lakeland Exchange

March 10 – April 25, 2008

Division of Service, Safety & Consumer Assistance

December 23, 2008

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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 March 10 – April 25, 2008, staff performed an evaluation on NOS Communications, Inc., (NOS). The test calls were conducted at a central office within the Lakeland 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

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 NOS, 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 140 1+ test calls over NOS’s network to verify timing accuracy. The test calls were made to numbers outside the Lakeland exchange and outside the Tampa Market Area LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that NOS 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+	140	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+	140	0	0	100%

III. Inter-LATA 1+ Billing per Tariff

NOS billed the 140 test calls with the timing increments and rates listed in the tariff. Staff concludes that NOS did bill per tariff.

IV. Inter-LATA Calling Card

Staff made 138 calling card test calls over NOS’s network to verify the timing and billing accuracy. The test calls were made to numbers outside the Lakeland exchange and outside the Tampa Market Area LATA utilizing NOS’s calling card. Initially, NOS correctly timed five calls, which resulted in a 3.6 percent timing accuracy for its calling card calls. NOS overtimed 131 of the test calls. NOS underbilled all 138 calls. This resulted in a 0 percent billing accuracy for its calling card. Staff concluded there appeared to be an issue with the timing and billing of the NOS calling card.

NOS stated in its response to the draft report that staff’s test account was not provisioned correctly. The account was not set up for calling card use but rather it was set up for another similar service offering. “Thus, the calling card data resultant of the Commission’s test is not representative of how NOS bills calling card customers in Florida.” NOS is requesting a re-test of its calling card services. Staff will re-test the NOS calling card service at a later date.