



## REPORT ON TARIFF COMPLIANCE

For

PNG Telecommunications, Inc., d/b/a PowerNet Global  
Communications

Ocala Exchange  
*October 13 – November 13, 2008*

Division of Service, Safety & Consumer Assistance  
January 29, 2009

# Report on Tariff Compliance

For

## **PNG Telecommunications, Inc., d/b/a PowerNet Global Communications**

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 PNG Telecommunications, Inc., (PNG). 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 PNG, 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 121 1+ test calls over PNG’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 PNG correctly timed 100 percent of the 1+ calls.

<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+	121	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 0 percent billing accuracy. All the calls were billed with a lower rate than what was listed in the tariff.

PNG stated in its response that it updated the tariff in June 2008 to a higher rate. “This increase was in anticipation of increased underlying carrier costs.” PNG stated that it worked out the cost issues and the higher rate never went into effect. The company “forgot to go back and reduce the rate in the tariff.” PNG will correct its tariff to reflect the correct lower price.

<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+	121	121	0	0%

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

PNG billed the 121 test calls with the timing increments listed in the tariff; however, it billed with a different rate than what is listed in the tariff. Staff concludes that PNG did not bill per tariff.

## IV. Inter-LATA Calling Card Timing Accuracy

Staff made 149 calling card test calls over PNG’s network to verify the timing accuracy. The test calls were made to numbers outside the Ocala exchange and outside the Gainesville LATA utilizing PNG’s calling card. PNG correctly timed 148 calls, which resulted in 99.3 percent timing accuracy for its calling card calls.

<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	149	1	0	99.3%

## **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. PNG billed 148 calls correctly resulting in 99.3 percent billing accuracy for its calling card calls. One call was underbilled because it was undertimed.

<b>Table 4 Inter-LATA Calling Card 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>				
Calling Card	149	1	0	99.3%

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

PNG billed the 149 calling card test calls based upon the timing increment and rates listed in the tariff. Staff concludes that PNG did bill per tariff.