



REPORT ON TARIFF COMPLIANCE

For

UCN, Inc.

Panama City Exchange

June 16 – July 23, 2008

Division of Service, Safety & Consumer Assistance

December 23, 2008

Report on Tariff Compliance

For

UCN, Inc.

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 UCN, Inc., (UCN). 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 UCN, 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 135 1+ test calls over UCN'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 UCN 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+	135	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+	135	0	0	100%

III. Inter-LATA 1+ Billing per Tariff

UCN billed the 135 test calls with the rates and timing increments listed in the tariff. Staff concludes that UCN did bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 151 calling card test calls over UCN'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 UCN's calling card. UCN correctly timed 139 calls, which resulted in a 92.1 percent timing accuracy for its calling card calls. Twelve calls were overtimed to the extent that the one-minute calls were timed as two-minute calls.

UCN stated in the response to the draft report that the rounding issue was an error in its billing system. The company has corrected this error. UCN researched the customers that were on the same plan as staff's test account and found \$39.76 was due to the customers. UCN will issue the credits to the affected customers.

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	151	0	12	92.1%

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. UCN billed 139 calls correctly resulting in a 92.1 percent billing accuracy for its calling card calls. Twelve calls were overbilled because they were overtimed. As previously mentioned, the overbilling was caused by a rounding error. UCN stated the error has been corrected.

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	151	0	12	92.1%

VI. Inter-LATA Calling Card Billing per Tariff

UCN billed the 151 calling card test calls based upon the timing increment and rates listed in the tariff. Staff concludes that UCN did bill per tariff.