



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

US LEC OF FLORIDA, INC.
d/b/a PAETEC BUSINESS SERVICES

Chiefland Exchange

April 2 - 13, 2007

Division of Competitive Markets & Enforcement

July 5, 2007

TABLE OF CONTENTS

Category		Page No.
I.	Inter-LATA 1+ Timing Accuracy	2
II.	Inter-LATA 1+ Billing Accuracy	2
III.	Inter-LATA 1+ Billing per Tariff.....	3
IV.	Inter-LATA Calling Card Timing Accuracy	3
V.	Inter-LATA Calling Card Billing Accuracy	3
VI.	Inter-LATA Calling Card Billing per Tariff	3

Report on Telecommunications Service Quality

For

US LEC of Florida, Inc. d/b/a PAETEC Business Services

Engineering Specialists of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct service quality evaluations of the telecommunications services provided by Interexchange Companies (IXCs) operating within the state of Florida. Section 364.08(1), Florida Statutes, mandates that "A telecommunications company may not charge, demand, collect, or receive for any service rendered or to be rendered any compensation other than the charge applicable to such service as specified in its schedule on file and in effect at that time. A telecommunications company may not refund or remit, directly or indirectly, any portion of the rate or charge so specified or extend to any person any advantage of contract or agreement or the benefit of any rule or regulation or any privilege or facility not regularly and uniformly extended to all persons under like circumstances for like or substantially similar service."

The service 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 or a price list on file with the Commission.

Staff performed a service evaluation on US LEC of Florida, Inc. d/b/a PAETEC Business Services (US LEC), during the period of April 2 - 13, 2007. The test calls were conducted at a central office of the Chiefland 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

Rule 25-24.485(g), Florida Administrative Code, states, "Companies shall charge only the rates contained in their tariff." This rule applies to all sections of an evaluation.

During the service evaluation, a series of test calls were generated to measure the timing of toll calls for billing analysis. To evaluate the accuracy of US LEC, 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 US LEC’s network to verify the timing accuracy. The test calls were made to numbers outside the Chiefland 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 US LEC correctly timed all of the calls yielding 100 percent timing accuracy for 1+ calls. US LEC met the 97 percent timing accuracy objective.

Table 1 Inter-LATA 1+ Timing Accuracy					
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed	97% Objective Met
Timing Accuracy					
1+	140	0	0	100.0%	Y

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. US LEC underbilled all the calls. This resulted in 0 percent billing accuracy and therefore US LEC did not meet the 97 percent billing accuracy objective.

Staff determined that US LEC charged the IntraLATA rate. All of the calls were InterLATA calls and should have been rated as InterLATA toll calls. US LEC’s response to the underbilling was that the tariff was incorrect. There was a mistake made in one tariff filing and not noticed in another tariff filing. US LEC researched the issue and according to its Marketing data, Sales data, and Billing System data, the InterLATA 1+ rate is being sold and billed at the rate that is charged on the bill, not what is listed in the tariff. US LEC corrected the tariff page to reflect the correct price. Because the tariff was incorrect during the period when staff made the calls, the results of the evaluation will not change.

Table 2 Inter-LATA 1+ Billing Accuracy					
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed	97% Objective Met
Billing Accuracy					
1+	140	140	0	0.0%	N

III. Inter-LATA 1+ Billing per Tariff

Of the 140 1+ test calls, US LEC charged the IntraLATA rate, which caused the underbilling. All the test calls made were InterLATA calls, not IntraLATA calls. The InterLATA rates according to US LEC’s tariff were higher than the IntraLATA rate. Staff concludes that US LEC did not bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 152 calling card test calls over US LEC’s network to verify the timing accuracy. The test calls were made to numbers outside the Chiefland exchange and outside the Gainesville LATA utilizing US LEC’s calling card. US LEC under timed one call and correctly timed the remaining calls. This resulted in a 99.3 percent timing accuracy for its calling card calls and therefore it did meet the 97 percent objective.

	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed	97% Objective Met
Timing Accuracy					
Calling Card	152	1	0	99.3%	Y

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. US LEC underbilled one call and correctly billed 151 calls. This resulted in a 99.3 percent billing accuracy. US LEC did meet the 97 percent objective.

	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed	97% Objective Met
Billing Accuracy					
Calling Card	152	1	0	99.3%	Y

VI. Inter-LATA Calling Card Billing per Tariff

Of the 152 calling card test calls that staff conducted, US LEC undertimed and underbilled one call. Staff concludes that US LEC did bill according to its tariff.