

REPORT ON TARIFF COMPLIANCE

For

Global Crossing Telecommunications, Inc.

Alachua Exchange

February 4 – March 14, 2008

Division of Competitive Markets & Enforcement

June 17, 2008

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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 364.04, 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 and 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 Commission during the service evaluation.

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 Global Crossing Telecommunications, Inc. (Global Crossing), during the period of February 4 – March 14, 2008. The test calls were conducted at a central office within the Alachua exchange and included testing and subsequent analysis of the following areas:

- Inter-LATA Calling Card Timing Accuracy
- Inter-LATA Calling Card Billing Accuracy
- Inter-LATA Calling Card Billing per Tariff

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 Global Crossing, 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 Calling Card Timing Accuracy

Staff made 146 calling card test calls over Global Crossing's network to verify the timing accuracy. The test calls were made to numbers outside the Alachua exchange and outside the Jacksonville LATA utilizing Global Crossing's calling card. The results were that Global Crossing correctly timed all the calls yielding a 100 percent timing accuracy for its calling card calls.

| Table 1 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 | 146 | 0 | 0 | 100% | | |

II. Inter-LATA Calling Card Billing Accuracy

The test calls that were evaluated for timing accuracy, found in Table 1, were used to verify the calling card billing accuracy found in Table 2. Global Crossing correctly billed all of the calls resulting in a 100 percent billing accuracy.

| Table 2 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 | 146 | 0 | 0 | 100% | | |

III. Inter-LATA Calling Card Billing per Tariff

Global Crossing billed the 146 calling card test calls based upon the timing increment and rate listed in the tariff. Staff concludes that Global Crossing did bill per tariff.