



REPORT ON TARIFF COMPLIANCE

For

Comtel Telcom Assets, LP d/b/a Excel
Telecommunications

Alachua Exchange

February 4 – March 14, 2008

Division of Service, Safety & Consumer Assistance

September 5, 2008

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Engineering Specialists of the Florida Public Service Commission's Division of Service, Safety and Consumer Assistance conduct tariff compliance evaluations of the telecommunications services provided by Interexchange Companies (IXCs) operating within the state of Florida. Subsection 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 Comtel Telcom Assets, LP d/b/a Excel Telecommunications (Comtel), 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 1+ Timing Accuracy
- Inter-LATA 1+ Billing Accuracy
- Inter-LATA 1+ 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 Comtel, 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 83 1+ test calls over Comtel’s network to verify the timing accuracy. The test calls were made to numbers outside the Alachua exchange and outside the Jacksonville LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that Comtel correctly timed 70 calls and undertimed 13 calls yielding an 84.3 percent timing accuracy for its 1+ calls. It appears that Comtel billed by minutes instead of 6 seconds, which the tariff indicates.

In Comtel’s response to the draft report, it reported that this issue was due to an internal technical error on the Commission’s test account. Comtel corrected the issue and sent staff a corrected bill. All the timing increments on the new bill were as the tariff indicated for the plan that was used for the test.

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+	83	13	0	84.3%

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. Comtel correctly billed 11 calls, underbilled 71 calls, and overbilled one call resulting in a 13.3 percent billing accuracy. It appears that Comtel was charging the “Off Peak” rate when the calls were made during the “Peak” rate.

Comtel stated in its response to the draft report, that the same technical issue that cause the timing issue also caused the billing. The corrected billed showed the appropriate prices according to the tariff, with one call being overtimed and overbilled.

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+	83	71	1	13.3%

III. Inter-LATA 1+ Billing per Tariff

Comtel did not use the timing increments that were listed in its tariff. Comtel also did not use the correct billing rates (Peak and Off Peak rates) that were listed in its tariff. Staff concludes that Comtel did not bill per tariff. Comtel has since corrected the internal issue that caused the incorrect timing and incorrect billing.