



REPORT ON TARIFF COMPLIANCE

For

Windstream Communications, Inc.

Alachua Exchange

February 4 – March 14, 2008

Division of Service, Safety & Consumer Assistance

September 5, 2008

Report on Tariff Compliance

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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 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.

Staff performed an evaluation on Windstream Communications, Inc. (Windstream), 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
- 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 Windstream, 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 280 1+ test calls over Windstream’s network to verify 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 Windstream 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+	280	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+	280	0	0	100%

III. Inter-LATA 1+ Billing per Tariff

Windstream billed the 280 test calls with the correct rate that was listed in the tariff. Windstream also timed the test calls with the timing increment that was listed in the tariff. Staff concludes that Windstream did bill per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 144 calling card test calls over Windstream’s network to verify the timing accuracy. The test calls were made to numbers outside the Alachua exchange and outside the Jacksonville LATA utilizing Windstream’s calling card. Windstream correctly timed 142 calls and undertimed two calls, which resulted in a 98.6 percent timing accuracy for its calling card calls.

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	144	2	0	98.6%

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. Windstream billed 142 calls correctly with two call billed incorrectly because of the undertiming. This resulted in a 98.6 percent billing accuracy for its calling card calls.

	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed
Billing Accuracy				
Calling Card	144	2	0	98.6%

VI. Inter-LATA Calling Card Billing per Tariff

Windstream billed the 144 calling card test calls based upon the timing increment and rate listed in the tariff. Staff concludes that Windstream did bill per tariff.