



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a
AT&T FLORIDA

Bronson, Cedar Key, Chiefland, Cross City, Dunnellon, Old Town, Trenton, and Yankeetown
Exchanges

April 2 – May 11, 2007

Division of Competitive Markets & Enforcement

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Report on Telecommunications Service Quality

For

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

Engineering Specialists of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct field service evaluations of the telecommunications services provided by Incumbent Local Exchange Companies (ILECs), Interexchange Companies (IXCs), and Competitive Local Exchange Companies (CLECs) operating within the state of Florida. Section 364.01(4)(c), Florida Statutes, mandates that the Commission "protect the public health, safety, and welfare by ensuring the monopoly services provided by telecommunications companies continue to be subject to effective price, rate, and service regulation."

The service evaluation objectives are (1) to evaluate a company's performance based on service standards and rules; (2) to verify the service results the company reported to the Commission on a periodic basis; (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations; and (4) to determine if the company is adhering to the Service Guarantee program approved by the Commission.

Staff performed a service evaluation on BellSouth Telecommunications, Inc. d/b/a AT&T Florida (AT&T), during the period of April 2 – May 11, 2007. The exchanges reviewed were Bronson, Cedar Key, Chiefland, Cross City, Dunnellon, Old Town, Trenton, and Yankeetown. The categories staff evaluated were as follows:

- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes Directory Review and New Number in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops - Transmission
- Repair Service, which includes Out-of-Service Restored within 24 Hours and Service Affecting Restored within 72 Hours
- Periodic Report Review
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+ and calling card, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions
- Service Guarantee Program (SGP) Rebates, which includes Installation SGP Rebates and Out-of-Service SGP Rebates
- Service Guarantee Program (SGP) Answer Time
- Service Guarantee Program (SGP) Report Review

I. Answer Time

Rule 25-4.073 (1) (a), F.A.C., Answering Time states:

For subscribers who either select the option of transferring to a live assistant [when the company utilizes a menu driven automated, interactive answering system], or do not interact with the system for twenty seconds, the call shall be transferred by the system to a live attendant. At least 90 percent of the calls shall be answered by the live attendant prepared to give immediate assistance within 55 seconds of being transferred to the attendant.

Staff conducted 149 calls to AT&T's business office and 148 calls to AT&T's repair service center. These calls were voice calls and AT&T did utilize a menu driven, automated, interactive answering system or an IVRU. According to the rule above, the standard for the business office and the repair service is 90 percent of the calls should be answered within 55 seconds of being transferred to the attendant. Additionally, staff made 50 calls using a Telecommunications Device for the Deaf (TDD) to both the business office and repair service.

During the 2006 service evaluation, AT&T answered 96.3 percent of the business office voice calls within standards and answered 100 percent of the business office TDD calls within standards. As Table 1 indicates, AT&T made an improvement for the voice calls; however, it failed to meet the standard for TDD calls to the business office during the 2007 service evaluation.

In AT&T's response to the draft report, AT&T determined that the TDD calls made to the business office and the repair center were routed through the preamble, and then to the service representative's personal greeting. This delayed the speed of answer. The speed of answer was also delayed because voice calls were taking precedence over the TDD calls. AT&T removed the preamble, which allows the calls to go directly to the representative's greeting and assigned different gates to the voice calls and the TDD calls.

Type of Calls	Total Calls	Calls Failed	Calls Answered	Calls Answered w/i Std.	% Answered	% Answered w/i Std.	90% Std. Met?
Voice	149	1	148	146	99%	98.6%	Y
TDD	50	0	50	38	100%	76.0%	N

Table 2, Answer Time – Repair Service, illustrates that AT&T answered 97.3 percent of the voice calls within the allotted time exceeding the answer time standard. However, TDD calls were only 85.7 percent; therefore, it failed to meet standards. As noted above, AT&T stated that voice calls were taking precedence over TDD calls.

The TDD answer time discrepancy that affected the business office and repair center was identified during the 2007 service evaluation. AT&T corrected the problem by removing the

preamble, directing calls to the representative's greeting, and assigning different gates within the automated interactive answering system. During the 2006 service evaluation, AT&T answered 77.4 percent of the voice calls to repair service and answered 100 percent of the TDD calls.

Type of Calls	Total Calls	Calls Failed	Calls Answered	Calls Answered w/i Std.	% Answered	% Answered w/i Std.	90% Std. Met?
Voice	148	1	147	143	99%	97.3%	Y
TDD	50	1	49	42	98%	85.7%	N

II. Adequacy of Directory Services

A. Directory Review

Rule 25-4.040, F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons are the applicable rules staff applies when evaluating the adequacy of directory services. These rules require specific actions, such as publishing updated telephone directories once every twelve months. They also require “911” instructions to be listed on the inside of the front cover as well as the FPSC contact information. Other specific instructions include a TDD listing for the incumbent’s business office.

Staff reviewed two of AT&T’s telephone directories for 21 possible deficiencies. One telephone directory labeled Dunnellon included the exchanges Dunnellon and Yankeetown. The other telephone directory labeled Tri-County Area included Bronson, Cedar Key, Chiefland, Cross City, Old Town, and Trenton exchanges. Both directories complied with the standards. In the 2006 evaluation, the telephone directory was also in compliance with the standards.

Name/ Date of Directory	Total Items Reviewed	Items in Compliance with Std.	% of Items in Compliance with Std.	100% Std. Met?
Dunnellon/ October 2007	21	21		
Tri-County Area / December 2007	21	21		
Company Total	42	42	100.0%	Y

B. New Numbers in Directory Assistance

Rule 25-4.040 (5), F.A.C., Telephone Directories; Directory Assistance states:

Directory assistance operators shall maintain records of all telephone numbers (except for non-published telephone numbers) in the area for which they have the responsibility of furnishing service. . . . All new or changed listings shall be provided to directory assistance operators within 48 hours after connection of service, excluding Saturdays, Sundays and holidays.

Staff reviewed 62 service orders that were more than 48 hours old, but not more than 76 hours old after connection of service. Staff called directory assistance (DA) to verify that the subscribers were in the DA database using the service orders as a guide. Some DAs allow more than one request for numbers on a single call. Staff made 61 calls to DA requesting 62 numbers indicating that staff made one call with multiple requests. AT&T's directory assistance found all 62 of the requested numbers. Table 4 represents the DA test results indicating AT&T met the standard in 2007; however, in 2006, it did not meet the standard.

Table 4 New Numbers in Directory Assistance				
Calls made to DA	Requests for Numbers	Total Found in DA	% Found in DA	99% Std. Met?
61	62	62	100%	Y

III. Availability of Service (Installation)

Rule 25-4.066 (2), F.A.C., Availability of Service states:

Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied in each exchange of at least 50,000 lines and quarterly in exchanges of less than 50,000 lines within an interval of three working days after receipt of application when all tariff requirements relating thereto have been complied with, except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

Rule 25-4.066 (3), F.A.C., Availability of Service states:

If the applicant requests an installation date beyond three working days, the requested date shall be counted as day three for measurement purposes.

Rule 25-4.066 (4), F.A.C., Availability of Service states:

When an appointment is made in order for the company to gain access to the customer's premises, the mutually agreed upon date will be day three for measurement purposes.

Eight exchanges were reviewed during the evaluation and all of the exchanges had less than 50,000 access lines. Staff requested the service orders for the first quarter of 2007, which is the period of January 1 - March 31, 2007.

During the Bronson exchange service order review, sixteen orders were excluded because the orders were for additional lines. Other service order exclusions often include construction of facilities. Staff bases this exclusion on the rule, as noted above, that states when facilities are readily available, service will be provided within three days for 90 percent of the service requests. Therefore, when the service order requires the construction of facilities then it is not readily available and it is excluded from the availability of service calculation. As Table 5 indicates, three additional orders were excluded in the Bronson exchange due to construction. Sixty orders were completed either within three days, on the appointment day and time, or on the day that the customer requested if it was greater than three days. This resulted in 100 percent of the service orders being completed within the allotted timeframe. The results for the Bronson exchange indicate that AT&T exceeded the availability of service standard.

Staff reviewed 22 orders for the Cedar Key exchange with four orders being excluded. All of the remaining 18 orders were completed within standards resulting in 100 percent of the service orders being completed within the standard. For the Chiefland exchange, 80 orders were reviewed with 22 orders being excluded or delayed for construction. Fifty-seven orders were completed within standards yielding a 98.3 percentage. Twenty-two orders were excluded or delayed for construction from the 84 service orders that were reviewed for the Cross City exchange. Sixty orders were completed within standards. This results in 96.8 percent compliance. The Cedar Key, Chiefland, and Cross City exchanges for the first quarter of 2007 exceeded the standard.

For the Dunnellon exchange, staff reviewed 312 service orders with 62 orders being excluded or delayed for construction. Two-hundred and thirteen of those orders were completed within standards. This results in an 85.2 percent compliance and it is below the 90 percent standard. Staff reviewed 116 orders for the Old Town exchange with 31 orders being excluded or delayed for construction. Eight-five orders were completed within standards resulting in 100 percent compliance. In the Trenton exchange, seventeen orders were excluded out of the 90 orders reviewed. Seventy were completed within standards resulting in 95.9 percent compliance. The total number of orders reviewed for the Yankeetown exchange was 41. Three orders were excluded and the remaining 38 orders were completed within standards resulting in a compliance of 100 percent. The results indicate that the Dunnellon exchange for the first quarter of 2007 was below the standard. The exchanges of Old Town, Trenton, and Yankeetown exceeded the 90 percent standards.

Five different exchanges were evaluated in 2006. Those results indicated all the exchanges met the standard compared to the one exchange out of eight that did not meet the

availability of service standard this year. Table 5 contains the service order breakdown for all eight exchanges.

Table 5 Availability of Service (Installation) 1st Qtr 2007							
Exchange	Total Orders Reviewed	Orders Excluded	Orders Delayed for Const.	Net Orders	Orders Completed w/i Std.	% of Orders Completed w/i Std.	90 % Std. Met?
Bronson	79	16	3	60	60	100%	Y
Cedar Key	22	4	0	18	18	100%	Y
Chiefland	80	18	4	58	57	98.3%	Y
Cross City	84	19	3	62	60	96.8%	Y
Dunnellon	312	50	12	250	213	85.2%	N
Old Town	116	30	1	85	85	100%	Y
Trenton	90	16	1	73	70	95.9%	Y
Yankeetown	41	2	1	38	38	100%	Y

IV. Subscriber Loops – Transmission

Rule 25-4.072(1), F.A.C., Transmission Requirements states:

Telecommunications companies shall furnish and maintain the necessary plant, equipment, and facilities to provide modern, adequate, sufficient, and efficient transmission of communications between customers in their service areas. Transmission parameters shall conform to ANSI/IEEE Standard 820 Telephone Loop Performance Characteristics (Adopted 1984) incorporated herein by reference.

Staff performs transmission tests as recommended by the ANSI/IEEE Standard 820-1984. The tests measure loop current, decibel loss, power influence, metallic noise, and balance. The loop is the facility that runs from the customer’s house to the telecommunications company’s office and equipment. The measurements recommended by the ANSI/IEEE Standard 820-1984 are transmission characteristics of the loop that indicate acceptable performance criteria. Staff performs subscriber loop measurements during service evaluations to verify that industry standards are being met. Any loops that are considered unsatisfactory should be referred to maintenance for repair.

Staff tested 546 customer loops in the Bronson, Cedar Key, Chiefland, Cross City, Dunnellon, Old Town, Trenton, and Yankeetown exchanges. The results, found in Table 6, indicate that nine loops were unsatisfactory. The remaining 537 loops were categorized as satisfactory. The overall subscriber loop evaluation is 98.4 percent, which is slightly above the standard. Table 6 contains the results for each exchange for the 2007 test year. During the 2006 service evaluation, the overall subscriber loop evaluation was 99.8 percent for the 527 loops that were tested.

Table 6 Subscriber Loops – Transmission						
Exchange	Total Loops Tested	Unsatisfactory		Satisfactory		98% Std. Met?
		Number	Percent	Number	Percent	
Bronson	50	3	6%	47	94%	N
Cedar Key	53	2	3.8%	51	96.2%	N
Chiefland	85	0	0%	85	100%	Y
Cross City	44	0	0%	44	100%	Y
Dunnellon	100	1	1%	99	99%	Y
Old Town	64	1	1.6%	63	98.4%	Y
Trenton	100	0	0%	100	100%	Y
Yankeetown	50	2	4%	48	96%	N
Company Total	546	9	1.6%	537	98.4%	

V. Repair Service Summary

Rule 25-4.070(1), F.A.C., Customer Trouble Reports states:

Each telecommunications company shall make all reasonable efforts to minimize the extent and duration of trouble conditions that disrupt or affect customer telephone service. Trouble reports will be classified as to their severity on a service interruption (synonymous with out-of-service or OOS) or service affecting (synonymous with Non-Out-Of-Service or non-OOS) basis. Service interruption reports shall not be downgraded to a service affecting report; however, a service affecting report shall be upgraded to a service interruption if changing trouble conditions so indicate.

Service interruptions include conditions such as no dial tone or not being able to originate a phone call. Service affecting troubles include conditions such as noise on the line or the telephone ringing when no one is on the line.

Staff reviewed 2,685 trouble reports in the Bronson, Cedar Key, Chiefland, Cross City, Dunnellon, Old Town, Trenton, and Yankeetown exchanges. Eighty-six reports were excluded from the evaluation. Staff excluded reports if they concerned unregulated features, such as voice mail, or if the customer canceled the trouble call. Of the remaining 2,599 reports reviewed, 1,739 reports were out-of-service reports and 860 reports were service-affecting reports. As stated in the Availability of Service section of this report, all the exchanges had less than 50,000 access lines; therefore, the first quarter of 2007 was reviewed.

A. Out-of-Service Restored Within 24 Hours

Rule 25-4.070(3)(a), F.A.C., Customer Trouble Reports states:

Service Interruption: Restoration of interrupted service shall be scheduled to insure at least 95 percent shall be cleared within 24 hours of the report in each exchange that contains at least 50,000 lines and will be measured on a monthly basis. For exchanges that contain less than 50,000 lines, the results can be aggregated on a quarterly basis. For any exchange failing to meet this objective, the company shall provide an explanation with its periodic report to the Commission.

Staff reviewed 204 out-of-service reports for the Bronson exchange. Of the reports reviewed, 192 were cleared within 24 hours. This exchange contains less than 50,000 access lines and staff aggregated the results. The Bronson exchange did not meet the service standard and its results, for the first quarter of 2007, were 94.1 percent.

For the Cedar Key exchange, staff reviewed 41 out-of-service reports and all the reports were cleared within 24 hours. The exchange's results were 100 percent. The Chiefland exchange had 179 reports in the first quarter of 2007, and 176 were cleared within 24 hours. The results for the Chiefland exchange were 98.3 percent. Cedar Key and Chiefland were the only two exchanges that met and exceeded the standard.

The other five exchanges, Cross City, Dunnellon, Old Town, Trenton, and Yankeetown, also contained less than 50,000 access lines and required the out-of-service reports to be analyzed on a quarterly basis. Table 7 Out-of-Service Reports contains the number of reports reviewed and cleared within 24 hours. None of these exchanges met the 95 percent standard; however, all of the exchanges were greater than 94 percent in restoring service within 24 hours.

During the 2006 service evaluation, staff reviewed 1,821 out-of-service repair reports for five different exchanges. Four exchanges met standards and one exchange failed to meet standards. The percentages for the five exchanges reviewed were 99.7 percent, 97.4 percent, 95 percent, 94.9 percent, and 98.3 percent. During this year's service evaluation, the percentages seemed to decline slightly from the previous evaluation.

In the response to the draft report, AT&T states that it has differed with staff as to whether or not the objectives are in fact a measure of satisfactory service delivered to customers. AT&T states it "has changed its dispatch strategy to meet customer's expectations, to increase efficiencies and to increase customer satisfaction. This does not necessarily always lead to meeting the stated numerical objectives." Staff notes that the numerical objectives are contained in the rules approved by the Commission and that AT&T is currently operating under an authorized service guarantee program (SGP) that requires AT&T to pay its customers when it fails to meet the objectives outlined within the SGP.

Table 7 Out-of-Service Reports Restored Within 24 Hours 1st Qtr 2007				
Exchange	OOS Reports	Reports Cleared w/i 24 hrs.	% Cleared w/i 24 hrs	95% Std. Met?
Bronson	204	192	94.1%	N
Cedar Key	41	41	100%	Y
Chiefland	179	176	98.3%	Y
Cross City	210	198	94.3%	N
Dunnellon	593	558	94.1%	N
Old Town	234	221	94.4%	N
Trenton	183	172	94%	N
Yankeetown	95	90	94.7%	N
Company Total	1739	1648	94.8%	

B. Service Affecting Restored Within 72 Hours

Rule 25-4.070(3)(b), F.A.C., Customer Trouble Reports states:

Service Affecting: Clearing of service affecting trouble reports shall be scheduled to insure at least 95 percent of such reports are cleared within 72 hours of the report in each exchange, which contains at least 50,000 lines and will be measured on a monthly basis. For exchanges, which contain less than 50,000 lines, the results can be aggregated on a quarterly basis.

In the service-affecting category, staff reviewed 860 repair tickets for all eight exchanges. Table 8 below details the results by exchange. In the Bronson exchange, 109 service-affecting reports were cleared within 72 hours. The Cedar Key exchange had 26 service affecting reports that were reviewed and all the reports were cleared within 72 hours. Seventy-nine service-affecting reports were reviewed for the Chiefland exchange and all the reports were cleared within 72 hours. Staff reviewed 67 service-affecting reports for the Cross City exchange. Again, all the reports were cleared within 72 hours.

The Dunnellon exchange's 337 service-affecting reports only had one report that was not cleared within 72 hours. This results in a 99.7 percent clearance of the service affecting reports, which is above the 95 percent standard. The Old Town exchange had 111 service affecting reports; all the reports were cleared within 72 hours. Eighty-five service-affecting reports were reviewed for the Trenton exchange. All of those reports were cleared within 72 hours. The final exchange, Yankeetown, had 46 service affecting reports that were reviewed with all the reports being cleared within 72 hours. All eight exchanges, during the first quarter of 2007, exceeded the service-affecting standard that requires exchanges to clear the service affecting report within 72 hours.

During AT&T's 2006 service evaluation, the five exchanges reviewed in the service affecting report category, also met standards. The percentages for the 2006 service evaluation were 100 percent, 100 percent, 99.6 percent, 98.6 percent, and 100 percent, respectively. Table 8 details the results by exchange for the 2007 evaluation.

Table 8 Service Affecting Reports Restored Within 72 Hours 1st Qtr 2007				
Exchange	SA Reports	Reports Cleared w/i 72 hrs.	% Cleared w/i 72 hrs	95% Std. Met?
Bronson	109	109	100%	Y
Cedar Key	26	26	100%	Y
Chiefland	79	79	100%	Y
Cross City	67	67	100%	Y
Dunnellon	337	336	99.7%	Y
Old Town	111	111	100%	Y
Trenton	85	85	100%	Y
Yankeetown	46	46	100%	Y
Company Total	860	859	99.9%	

VI. Periodic Report Review

Rule 25-4.0185, F.A.C., Periodic Reports states:

Each local exchange telecommunications company shall file with the Commission's Division of Competitive Markets and Enforcement the information required by Communications Form PSC/CMP 28 (4/05), which is incorporated into this rule by reference.

During an evaluation, staff compares the periodic report filed by the company to the results of the service evaluation. Staff reviews schedules 2, 11, 15, and 16 of the periodic report: schedule 2 is Availability of Service, schedule 11 is Repair Service, schedule 15 is Repair Service Answer Time, and schedule 16 is Business Office Answer Time. Staff typically reconciles the schedules with the evaluation data collected. For example, if answer time calls were conducted in February, staff will review schedules 15 and 16 that were filed by AT&T for the month of February.

Table 9 contains the reconciliation of the service evaluation results for answer time, availability of service, and repair within the 24 and 72-hour intervals with AT&T's filed reports. There was a difference of nine items. Staff also verifies whether the reports are forwarded in a timely manner. AT&T did file its periodic report on time.

AT&T stated that the reason the periodic report and the 2007 service evaluation results reflected different information was due to the differences in the criteria used to pull the data for the 2007 service evaluation as opposed to the criteria used to generate the periodic reports. "For example, the [out-of-service] data include all disposition codes, where schedule 11 ([Out-of-

Service] troubles and [Service Affecting] troubles) only includes network disposition codes. Additionally, schedule 11 excludes type code 5-Memory Call, which was included in the 2007 [service] evaluation criteria. Due to the variations in the criteria used to generate the reports, differences occurred when comparing the periodic report and the 2007 [service] evaluation results.” Staff agrees with AT&T’s response in that the differences between the periodic report and the service evaluation can be attributed to variations in the data for the service evaluation. For example, the periodic report known as Schedule 2 contains all the requests for primary service. The service evaluation examined primary residential service and excluded any primary business lines. In addition, staff has the advantage of the complete trouble ticket and on occasion, may reclassify a condition from service affecting to out of service. This reclassification will produce differences between the periodic report and the service evaluation results.

Table 9 Periodic Report Review				
Item Reviewed	Exchange	Month	Std. Met per Periodic Report	Std. Met per Service Eval.
Answer Time Business Office Repair Service		April 2007	Y	Y
		April 2007	Y	Y
Availability of Service	Bronson	1 st Qtr 2007	N	Y
	Cedar Key	1 st Qtr 2007	N	Y
	Chiefland	1 st Qtr 2007	N	Y
	Cross City	1 st Qtr 2007	N	Y
	Dunnellon	1 st Qtr 2007	N	N
	Old Town	1 st Qtr 2007	N	Y
	Trenton	1 st Qtr 2007	N	Y
	Yankeetown	1 st Qtr 2007	N	Y
Repair Service – OOS 24 Hours	Bronson	1 st Qtr 2007	N	N
	Cedar Key	1 st Qtr 2007	N	Y
	Chiefland	1 st Qtr 2007	N	Y
	Cross City	1 st Qtr 2007	N	N
	Dunnellon	1 st Qtr 2007	N	N
	Old Town	1 st Qtr 2007	N	N
	Trenton	1 st Qtr 2007	N	N
	Yankeetown	1 st Qtr 2007	N	N
Repair Service – SA 72 Hours	Bronson	1 st Qtr 2007	Y	Y
	Cedar Key	1 st Qtr 2007	Y	Y
	Chiefland	1 st Qtr 2007	Y	Y
	Cross City	1 st Qtr 2007	Y	Y
	Dunnellon	1 st Qtr 2007	Y	Y
	Old Town	1 st Qtr 2007	Y	Y
	Trenton	1 st Qtr 2007	Y	Y
	Yankeetown	1 st Qtr 2007	Y	Y
Comparison between Periodic Report & Service Evaluation	Items Reviewed	Items that are the Same	Items that are Different	% of Same Items
	26	17	9	65.4%

VII. Safety – Ground Deficiencies

Rule 25-4.038, F.A.C., Safety states:

Each utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities. All subscriber loops shall be properly installed to prevent harm to the public as referenced in Article 800.30 and 800.31 of the National Electric Code (NEC), incorporated herein by reference.

The National Electric Code provides specific guidance about grounding telephone systems. Proper grounding of the subscriber loop helps protect the subscribers and their property.

Staff tested 511 loops in the eight exchanges during the 2007 service evaluation. Eighty-one loops were new installations for service and 430 loops were randomly tested. Ten loops were found to have poor grounds. Of the loops found to have poor grounds, all were of the randomly tested category. For the newly installed loops, the standard is 100 percent of the loops must have proper grounding. In the randomly tested category, the grounding standard is 92 percent.

During the evaluation, two loops for new installations were excluded from the count. One loop was in Dunnellon and it was excluded because staff's lead engineer and AT&T management were not able to verify that the ground was defective. In this case, field personnel had disassembled all of the ground connections prior to verification and the suspected deficiency could not be duplicated. The other excluded loop was in the Old Town exchange. This loop was installed in very sandy soil. AT&T already had the maximum number of ground rods required; however, the ground reading was still showing a poor ground. Staff and AT&T are still investigating a resolution to the poor ground reading.

During the 2006 service evaluation, staff tested 130 loops for new installation of service. All the loops had proper grounds. This was 100 percent for new installs. Staff also tested 344 random loops for AT&T's customers in 2006. No loops had a poor ground, resulting in 100 percent of loops with proper grounds. Of the 430 random loops that staff tested this year, only ten loops had poor grounds. This is a 97.7 percent compliance, which is above the 92 percent standard. Table 10 contains the ground deficiency results for each exchange.

Table 10 Safety – Ground Deficiencies				
Exchange	Loops Tested	Poor Grounds	Adequate Grounds %	Std. Met?
New Installs				Std. = 100.0%
Bronson	7	0	100%	Y
Cedar Key	2	0	100%	Y
Chiefland	13	0	100%	Y
Cross City	3	0	100%	Y
Dunnellon	30	0	100%	Y
Old Town	13	0	100%	Y
Trenton	11	0	100%	Y
Yankeetown	2	0	100%	Y
Company Total	81	0	100%	
Random Loops				Std. = 92.0%
Bronson	42	0	100%	Y
Cedar Key	50	0	100%	Y
Chiefland	64	0	100%	Y
Cross City	37	0	100%	Y
Dunnellon	69	0	100%	Y
Old Town	46	2	95.7%	Y
Trenton	74	1	98.6%	Y
Yankeetown	48	7	85.4%	N
Company Total	430	10	97.7%	

VIII. Timing and Billing Accuracy

A. Intra-LATA 1+ and Calling Card

Rule 25-4.077 (3), F.A.C., Metering and Recording Equipment states:

Metering and timing equipment shall be maintained so that the accuracy of the company billing operations enjoys a high confidence level from their customers. After allowance for a one-second variation, timing accuracy shall be not less than 97 percent.

A series of test calls are usually generated to measure the timing of local toll calls or Intra-LATA calls for billing purposes. These tests are precisely timed to ensure that the elapsed times were the same for each series of calls. To evaluate the accuracy of a company's network, all test calls are completed using our computerized timing tester. Normally, calls are completed at each of the following 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 are analyzed and compared to the records generated by the tests for origination and duration time 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.

Staff did not make Intra-LATA 1+ or Calling Card test calls over AT&T's network. The numbers to be tested as Intra-LATA calls were not Intra-LATA calls; the numbers were within the Extended Calling Service (ECS) area. Staff did not verify that the test numbers were Intra-LATA calls before testing. The bills for the staff's test calls were ECS calls and indicated a charge of \$0.25 per call. AT&T's tariff, on file with the Commission, reflects the same charge; therefore, AT&T did bill per tariff.

During AT&T's service evaluation in 2006, the 1+ Intra-LATA test calls were not conducted. The 2006 evaluation report states that the Intra-LATA calls were not conducted because ECS and Extended Area Service (EAS) calls were available throughout the LATA.

B. Directory Assistance

Rule 25-4.115, F.A.C., Directory Assistance states:

- (1) Directory assistance service provided by any telephone company shall be subject to the following:
 - (a) Charges for directory assistance shall be reflected in tariffs filed with the Commission and shall apply to the end user.
 - (b) The tariff shall state the number of telephone numbers that may be requested by a customer per directory assistance call.
- (2) Charges for calls within a local calling area or within a customer's Home Numbering Plan Area (HNPA) shall be at rates prescribed in the general service tariff of the local exchange company originating the call and shall be subject to the following:
 - (a) There shall be no charge for directory assistance calls from lines or trunks serving individuals with disabilities. . . .
 - (b) The same charge shall apply for calls within a local calling area and calls within an HNPA.
 - (c) The tariff shall state the number of calls per billing month per individual line or trunk to the number designated for local directory assistance (i.e., 411, 311, or 611) for which no charge will apply. The local exchange company shall charge for each local directory assistance call in excess of this allowance. . . .

Staff conducted directory assistance (DA) testing on two lines. One line was designated as a TDD line or a line for an individual with disabilities. AT&T did not charge for the calls made on the TDD line, which is correct. On the other line, staff made fifty calls. According to AT&T's tariff, there are no allowances. Therefore, the billable directory assistance calls are fifty calls. AT&T billed for fifty calls. This results in 100 percent, which is above the standard of 97 percent.

The bills for the DA calls charged \$1.25 per call. AT&T's tariff states that the price for a DA call is \$1.25 per call. Staff concluded that AT&T billed per tariff for the DA calls.

Table 11 Timing and Billing – Directory Assistance									
Central Office	Telephone Number	Calls Made	Allowance	Billable Calls	Calls Billed	Variance	Percent Correctly Billed	97 % Std. Met?	Billed per Tariff
Chiefland	352-490-0634	50	0	50	50	0	100%	Y	Y

IX. 9-1-1 Emergency Service

Rule 25-4.081(1), F.A.C., Emergency 911 Access states:

Access to emergency 911 services shall be provided by the local exchange company to basic local exchange company subscribers.

From the Chiefland exchange, staff made 94 voice calls and 50 TDD calls to 911 emergency services. For the TDD calls, there were thirteen fast busy signals detected which are considered failed calls. For AT&T's review, this results in a 74 percent completed call rate for the TDD calls and 100 percent completed calls to 911 emergency services for the voice calls.

During the 2006 service evaluation, 100 percent of the voice calls to 911 over AT&T's network were completed and the TDD calls had 100 percent completion.

Table 12 911 Emergency Service							
Area	NXX	Calls Made	Busy Calls	Failed Calls	Calls Completed	% of Calls Completed	100 % Std. Met?
Voice Calls							
Chiefland	490	94	0	0	94	100%	
Company Total		94	0	0	94	100%	Y
TDD Calls							
Chiefland	490	50	0	13	37	74%	
Company Total		50	0	13	37	74%	N

X. Service Guarantee Program (SGP) Rebates

Rule 25-4.085, F.A.C., Service Guarantee Program states:

A company may petition the Commission for approval of a Service Guarantee Program, which would relieve the company from the rule requirement of each service standard addressed in the approved Service Guarantee Program. When evaluating a Service Guarantee Program for approval, the Commission will consider the Program's benefits to the customers and whether the Program is in the public interest. The Commission shall have the right to enforce the provisions of the Service Guarantee Plan.

Docket Number 050095-TL allows AT&T to operate under a Service Guarantee Program (SGP), which includes a limited waiver of rules pertaining to the Availability of Service (Installations) and Repair of Service. While the SGP is in affect, the Commission has the authority to ensure that service is adequate and reasonable. AT&T's SGP includes plans for rebating customers for missed installations and out-of-service conditions outlined in the docket.

A. Installation SGP Rebates

According to the SGP outlined in Docket Number 0500095-TL, for Primary Service Installation the customer will receive an automatic credit of \$25.00 when AT&T fails to install the service on the date that the customer and AT&T agreed upon, otherwise known as the commitment date. Where AT&T is offering a commitment date greater than three days and the customer requests an earlier date, the SGP credit will be based on the customer requested date, or on three days, whichever is greater.

While reviewing the service orders for the evaluation, staff also determined if SGP rebates were due to customers. In the eight exchanges reviewed for January 2007, staff found seven SGP credits were due for missed installation commitments. Staff also found five SGP credits were due in February 2007. For March 2007, staff found six SGP credits that were due. Table 13 shows the SGP credits due by month for each exchange.

Table 13 Installation SGP Rebates				
Month	Exchange	Rebates Due	Rebates Given	% Given
Jan - 07	Bronson	0		
	Cedar Key	0		
	Chiefland	0		
	Cross City	0		
	Dunnellon	7	7	100%
	Old Town	0		
	Trenton	0		
	Yankeetown	0		
	Company Total	7	7	100%
Feb - 07	Bronson	0		
	Cedar Key	0		
	Chiefland	0		
	Cross City	0		
	Dunnellon	5	5	100%
	Old Town	0		
	Trenton	0		
	Yankeetown	0		
	Company Total	5	5	100%
Mar - 07	Bronson	0		
	Cedar Key	0		
	Chiefland	0		
	Cross City	0		
	Dunnellon	6	6	100%
	Old Town	0		
	Trenton	0		
	Yankeetown	0		
	Company Total	6	6	100%

During the 2006 service evaluation, staff found that fourteen installation SGP credits were due to customers. AT&T automatically gave thirteen credits, missing one. This resulted in 92.9 percent of installation SGP rebates given.

AT&T stated in its response to the draft report that one of the installation credits that staff determined was due to a customer was not due. AT&T stated that the service installation required a buried service wire (BSW) and that it should have been excluded for construction. Staff questioned the exclusion because a BSW is not normally excluded. AT&T stated that approximately 7,500 feet of wire was required to provide service to this customer. Staff agreed with AT&T that this service installation order should be excluded for construction because the customer is in a rural area and it took approximately 7,500 feet of BSW to provide service.

B. Out-of-Service SGP Rebates

AT&T's SGP states that when AT&T fails to complete an out-of-service repair within 24 hours from the time the report is received, the customer will receive an automatic credit. The credit will be in the amount of \$4.00 plus three times the daily local service charge, up to \$40.00

and no less than \$11.00. Saturdays, Sundays, and holidays are included in calculating the service credits. The SGP credits only apply to the primary residential local service.

During the repair ticket review, staff found that 61 SGP rebates were due to customers for January 2007. Forty-three SGP rebates were found due in February 2007. For March 2007, staff found that 25 rebates were due to customers. Table 14 shows the credits due by month for each exchange. Cedar Key did not have any rebates due. The remaining seven exchanges had rebates that were due; however, not all were rebated automatically.

In the previous evaluation, staff found that 88 out-of-service SGP rebates were due customers. AT&T provided 66 of those rebates automatically. This resulted in 75 percent of automatic SGP rebates given to customers.

In AT&T's response to the draft report and in previous draft evaluations responses, AT&T states that it "statuses a customer's service as [out-of-service] based on the customer's report, line test results, and what a technician determines to be the cause of the trouble in the field. In every case where staff and AT&T agreed that a customer was [out-of-service] a rebate has been provided. AT&T has started the process of rebating those customers where AT&T and staff were not able to agree on whether or not the customer was [out-of-service]."

AT&T notes that staff initially found 130 SGP credits were due to customers and that AT&T provided 117 of those credits to the customers. AT&T states that eleven of the thirteen credits due represent the situation where AT&T and staff do not agree on whether or not the customer was out-of-service. One of the two remaining credits was not given because staff provided the incorrect telephone number to AT&T to verify the credit. AT&T provided proof that the correct telephone number account received the automatic SGP credit. The other telephone number that staff provided to AT&T to verify the credit was not due a credit at all. AT&T found that the trouble report was cleared in less than 24 hours. Staff rechecked the trouble report and agreed with AT&T that the trouble was cleared within 24 hours. Therefore, 129 SGP credits were due to customers and 118 were automatically rebated. Staff agrees with AT&T that the remaining 11 SGP credits that were not automatically rebated can be attributed to staff's determination that a rebate was required after review of the completed trouble report.

Table 14 Out-of-Service SGP Rebates				
Month	Exchange	Rebates Due	Rebates Given	% Given
Jan – 07	Bronson	12	9	75%
	Cedar Key	0		
	Chiefland	3	3	100%
	Cross City	2	2	100%
	Dunnellon	30	27	90%
	Old Town	8	7	87.5%
	Trenton	4	3	75%
	Yankeetown	2	2	100%
	Company Total	61	53	86.9%
Feb – 07	Bronson	3	3	100%
	Cedar Key	0		
	Chiefland	2	2	100%
	Cross City	7	7	100%
	Dunnellon	19	17	89.5%
	Old Town	4	4	100%
	Trenton	5	5	100%
	Yankeetown	3	3	100%
	Company Total	43	41	95.3%
Mar – 07	Bronson	4	4	100%
	Cedar Key	0		
	Chiefland	1	1	100%
	Cross City	3	2	66.7%
	Dunnellon	6	6	100%
	Old Town	6	6	100%
	Trenton	3	3	100%
	Yankeetown	2	2	100%
	Company Total	25	24	96%

XI. SGP Answer Time

Rule 25-4.085, F.A.C., Service Guarantee Program, which was quoted in the Service Guarantee Program (SGP) Rebates section, applies to this section, also. As stated in the previous section, the SGP is outlined in Docket Number 050095-TL. According to the SGP, where AT&T fails to meet the answer time measurement, it will credit the Lifeline Community Service Fund (the Fund). The standard is listed in the first section, Answer Time. AT&T will credit the Fund separately for the business office and repair center. AT&T will credit the Fund \$2,000 if it achieves a percentage for answer time of less than 90 percent but greater or equal to 80 percent. If the answer time percentage is less than 80 percent but greater or equal to 70 percent, AT&T will credit the Fund \$5,000. The Fund will be credited \$7,000, if AT&T's percentage for answer time is less than 70 percent. For example, if AT&T achieves 85 percent for the business office and 78 percent for the repair center, AT&T will credit \$2,000, for the business office and \$5,000 for the repair center to the Fund.

All of staff's answer time test calls were made in the month April 2007. The results of the answer time test calls were AT&T achieved 98.6 percent for the business office and 97.3 percent

for the Repair Center. AT&T's SGP report indicated that it would not credit the Fund for the month of April 2007. This is the same conclusion that staff reached since the business office and the repair center exceeded the 90 percent standards for April 2007.

XII. SGP Report Review

Rule 25-4.085, F.A.C., Service Guarantee Program applies to this section, also. The SGP is outlined in Docket Number 050095-TL and accordingly, AT&T will provide quarterly reports detailing the amount of SGP credits that were given.

Table 15 indicates the results of staff's reconciliation of the evaluation test results and AT&T's filed SGP reports. There was a difference of sixteen items. Staff also reviews whether the SGP reports are forwarded in a timely manner. AT&T did file its SGP report on time.

Staff asked AT&T to explain why the SGP report and the 2007 service evaluation results differ. AT&T responded that "timing is the primary reason that causes the difference in the number of SGP credits provided in the quarterly reports opposed to the 2007 [service] evaluation results. For example, in the quarterly report, the month of February could have carry-overs from January as well as troubles reported in February, but not credited until their billing cycle, which may actually be March. The SGP credit shown on the quarterly report appears in the month that the customer actually receives the credit on their bill."

Table 15 SGP Report Review				
Category	Month	Exchange	SGP Credited	
			SGP Report	Ser. Eval.
Installation Credits	Jan - 07	Bronson	Y	N
		Cedar Key	Y	N
		Chiefland	N	N
		Cross City	Y	N
		Dunnellon	Y	Y
		Old Town	N	N
		Trenton	Y	Y
		Yankeetown	N	N
	Feb - 07	Bronson	N	Y
		Cedar Key	N	N
		Chiefland	Y	N
		Cross City	Y	N
		Dunnellon	Y	Y
		Old Town	Y	N
		Trenton	Y	N
		Yankeetown	N	N
	Mar - 07	Bronson	Y	N
		Cedar Key	N	N
		Chiefland	Y	N
		Cross City	Y	N
		Dunnellon	Y	Y
		Old Town	Y	N
		Trenton	Y	N
		Yankeetown	N	N
Out-of-Service Credits	Jan - 07	Bronson	Y	Y
		Cedar Key	Y	N
		Chiefland	Y	Y
		Cross City	Y	Y
		Dunnellon	Y	Y
		Old Town	Y	Y
		Trenton	Y	Y
		Yankeetown	Y	Y
	Feb - 07	Bronson	Y	Y
		Cedar Key	Y	N
		Chiefland	Y	Y
		Cross City	Y	Y
		Dunnellon	Y	Y
		Old Town	Y	Y
		Trenton	Y	Y
		Yankeetown	Y	Y
	Mar - 07	Bronson	Y	Y
		Cedar Key	Y	N
		Chiefland	Y	Y
		Cross City	Y	Y
		Dunnellon	Y	Y
		Old Town	Y	Y
		Trenton	Y	Y
		Yankeetown	Y	Y
Comparison between SGP Report & Ser Eval.	Items Reviewed	Items that are the Same	Items that are Different	% of Same Items
	48	32	16	66.7%