



REPORT ON TELECOMMUNICATIONS  
SERVICE QUALITY

For

FRONTIER COMMUNICATIONS of the SOUTH, LLC

Molino and Walnut Hill Exchanges

*July 30 – August 10, 2007*

Division of Competitive Markets & Enforcement

April 29, 2008

# TABLE OF CONTENTS

<b>Category</b>	<b>Page No.</b>
I. Answer Time .....	2
II. Adequacy of Directory Services.....	3
A. Directory Review .....	3
B. New Numbers in Directory Assistance .....	4
III. Availability of Service (Installation) .....	5
IV. Subscriber Loops – Transmission.....	7
V. Repair Service Summary.....	8
A. Out-of-Service Restored Within 24 Hours.....	9
B. Service Affecting Restored Within 72 Hours .....	10
C. Rebates .....	11
VI. Periodic Report Review.....	13
VII. Safety – Ground Deficiencies.....	15
VIII. Timing and Billing Accuracy.....	16
A. Intra-LATA 1+ and Calling Card.....	16
B. Directory Assistance .....	17
IX. 9-1-1 Emergency Service .....	18

# LIST OF TABLES

<b>Tables</b>	<b>Page No.</b>
<b>Table 1 Answer Time – Business Office</b> .....	<b>3</b>
<b>Table 2 Answer Time – Repair Service</b> .....	<b>3</b>
<b>Table 3 Directory Reviewed</b> .....	<b>4</b>
<b>Table 4 New Numbers in Directory Assistance</b> .....	<b>5</b>
<b>Table 5 Availability of Service (Installation)</b> .....	<b>7</b>
<b>Table 6 Subscriber Loops – Transmission</b> .....	<b>8</b>
<b>Table 7 Out-of-Service (OOS) Reports Restored Within 24 Hours</b> .....	<b>10</b>
<b>Table 8 Service Affecting (SA) Reports Restored Within 72 Hours</b> .....	<b>11</b>
<b>Table 9 Rebates</b> .....	<b>12</b>
<b>Table 10 Periodic Report Review</b> .....	<b>14</b>
<b>Table 11 Safety – Ground Deficiencies</b> .....	<b>15</b>
<b>Table 12 Timing and Billing – Directory Assistance</b> .....	<b>18</b>
<b>Table 13 911 Emergency Service</b> .....	<b>18</b>

# **Report on Telecommunications Service Quality**

**For**

## **Frontier Communications of the South, LLC**

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; and (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations.

Staff performed a service evaluation on Frontier Communications of the South, LLC (Frontier), during the period of July 30 – August 10, 2007. The exchanges reviewed were Molino and Walnut Hill. 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, Service Affecting Restored within 72 Hours, and Rebates
- 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

The last evaluation of Frontier was in 2001. In accordance with Rule 25-4.210 (1), F.A.C., Service Evaluations and Investigations, small local exchange companies are evaluated no more than every four years.

## **I. Answer Time**

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

(a) At least 90 percent of the calls directed to repair services and 80 percent of the all calls to the business office shall be answered within 30 seconds after the last digit is dialed when no menu driven system is utilized.

(b) When a company utilizes a menu driven automated interactive answering system (referred to as the system or as an Integrated Voice Response Unit (IVRU)) at least 95 percent of the calls shall be answered within 15 seconds after the last digit is dialed. The initial recorded message presented by the system to the customer shall include the option of transferring to a live attendant within the first 30 seconds of the message.

(c) 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 150 calls to Frontier's business office and 150 calls to Frontier's repair service center. These calls were voice calls and Frontier did utilize a menu driven, automated, interactive answering system or an IVRU for the business office and did not utilize an IVRU for the repair center. According to the rule above, the standard for the business office is 90 percent of the calls should be answered within 55 seconds of being transferred to the attendant and the standard for the repair center is 90 percent of the calls should be answered within 30 seconds after the last digit dialed. Additionally, staff made 50 calls using a Telecommunications Device for the Deaf (TDD) to both the business office and repair service.

During the 2001 service evaluation, Frontier answered 75 percent of the business office voice calls within standards at that time and answered 93.4 percent of the business office TDD calls within standards. The standard in effect at that time was 85 percent of the business office calls should be answered within 55 seconds after the last digit dialed. As Table 1 indicates, Frontier made an improvement for the voice calls and TDD calls to the business office during the 2007 service evaluation.

<b>Table 1 Answer Time – Business Office - IVRU</b>								
<b>Type of Calls</b>	<b>Total Calls</b>	<b>Calls Failed</b>	<b>% of Calls Offered</b>	<b>95% Std. Met?</b>	<b>Calls Answered</b>	<b>Calls Answered w/i Std.</b>	<b>% Answered w/i Std.</b>	<b>90% Std. Met?</b>
<b>Voice</b>	150	0	100%	Y	150	150	100.0%	<b>Y</b>
<b>TDD</b>	50	0	100%	Y	50	49	98.0%	<b>Y</b>

Table 2, Answer Time – Repair Service, illustrates that Frontier answered 90.7 percent of the voice calls within the allotted time exceeding the answer time standard. Staff notes that 48 of the 50 TDD calls were answered; however, none of the TDD calls met the answer time standard. The telephone number that Frontier listed for the TDD numbers for both the business office and the repair center were routed directly to the Florida Relay Service (FRS). Staff believes the TDD users should be provided with complete dialing instructions and telephone numbers that include both the FRS and the voice numbers of its repair center and business office keeping in mind that it must meet the answer time standard defined within the rule. During the 2001 service evaluation, Frontier answered 72.4 percent of the voice calls to repair service and answered zero percent of the TDD calls within the standards at that time. The standard during the 2001 evaluation was that 95 percent of the calls to the repair center should be answered within 55 seconds after the last digit is dialed.

Frontier’s response indicated that the slow answer times were “related to problems in MCI’s equipment that has since been updated.” To reach the repair service through the FRS, staff used the 1-800 number listed in the directory. The customers using the 1-800 number to reach the repair service are routed through MCI. Frontier also stated, “A review of the numbers listed in the directory and their translations in the switch did pose some confusion. Directories will be modified to show the FRS numbers with explicit instructions of what number to request of the FRS operator [to dial] to reach Frontier’s Business Office and we will clearly show the direct TDD numbers to reach Frontier’s Repair Department.”

<b>Table 2 Answer Time – Repair Service – No IVRU</b>							
<b>Type of Calls</b>	<b>Total Calls</b>	<b>Calls Failed</b>	<b>Calls Answered</b>	<b>Calls Answered w/i Std.</b>	<b>% Answered</b>	<b>% Answered w/i Std.</b>	<b>90% Std. Met?</b>
<b>Voice</b>	150	0	150	136	100%	90.7%	<b>Y</b>
<b>TDD</b>	50	2	48	0	96%	0.0%	<b>N</b>

## **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 the Frontier telephone directory for 21 items. The telephone directory included the exchanges of Molino and Walnut Hill. The directory had one deficiency. The telephone directory gave a number for the business office and a different number for the repair center for TDD users to use. Those numbers connected directly to the Florida Relay Service (FRS). There are no other directions for the TDD users. The telephone directories need to either give new numbers that connect directly with the different offices of Frontier or give the TDD users information about what number to ask the FRS operator to call after connecting to the FRS. In the 2001 evaluation, the telephone directory did not comply with the standards because the directory did not list the FRS toll-free number in the alphabetical listing. Frontier corrected this issue before the current evaluation.

In its response, Frontier mentioned that its directories “go to print in August for delivery to customers during the month of December. Frontier has revised the entire section for TDD in order to allow for ease of use.” Frontier provided staff with the updated page to the directory. Frontier provided the FRS number and the numbers to have the FRS operator call to reach Frontier’s Business Office, Repair Center, and a TDD number for Directory Assistance.

**Table 3 Directory Reviewed**

<b>Name/ Date of Directory</b>	<b>Total Items Reviewed</b>	<b>Items in Compliance with Std.</b>	<b>% of Items in Compliance with Std.</b>	<b>100% Std. Met?</b>
<b>Molino – Walnut Hill / November 2007</b>	<b>21</b>	<b>20</b>		
<b>Company Total</b>	<b>21</b>	<b>20</b>	<b>95.2%</b>	<b>N</b>

**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 11 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 11 calls to DA requesting 11 numbers

indicating that staff did not make calls with multiple requests. Frontier’s directory assistance found nine of the requested numbers. One of the numbers that was missed was not in the DA database at all. Frontier relies on a third party vendor to provide updates to the DA database. Frontier is in the process of changing from a third party to itself. The other number that was missed was listed in the DA database incorrectly. The last name was listed as the first name.

Frontier indicated that during the time of the evaluation, it “was in the process of re-homing all directory assistance calls to” its New York offices and it was in the process of updating the DA database at the same time. “Frontier had previously relied on a third party vendor to provide updates to the DA database causing a delay in receiving records in a timely manner. Since the evaluation, Frontier has eliminated the third party vendor and updates are made in a timely manner eliminating errors such as reversing first name and last name.” Frontier believes that this has resolved the issues experienced by staff. Table 4 represents the DA test results indicating Frontier did not meet the standard.

<b>Table 4 New Numbers in Directory Assistance</b>				
<b>Calls made to DA</b>	<b>Requests for Numbers</b>	<b>Total Found in DA</b>	<b>% Found in DA</b>	<b>99% Std. Met?</b>
<b>11</b>	<b>11</b>	<b>9</b>	<b>81.8%</b>	<b>N</b>

During the 2001 service evaluation, Frontier found 65.6 percent of new numbers in the directory assistance database. In the 2001 service evaluation report, it states that Frontier missed this objective due to Frontier’s late fax transmissions to BellSouth Telecommunications, Inc., the DA provider at that time. There were also delays by BellSouth in processing the faxes. Frontier corrected this situation by establishing an automated system that E-mails the new directory assistance information to BellSouth on the morning after posting the completed service order. In 2007, the percentage increased to 81.8 percent of new numbers being found in the directory assistance database.

### **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.

Both exchanges reviewed have less than 50,000 access lines. Staff requested the service orders for the third quarter of 2006, which is the period of July 1 – September 30, 2006; the fourth quarter of 2006, which is the period of October 1 – December 31, 2006; the first quarter of 2007, which is the period of January 1 – March 31, 2007; and the second quarter of 2007, which is the period of April 1 – June 30, 2007.

During the Molino exchange service order review, 41 orders were excluded. These service order exclusions included construction of facilities. Staff bases these exclusions 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. Originally, 203 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 76.6 percent of the service orders being completed within the allotted timeframe.

For the Walnut Hill exchange, staff reviewed 175 orders with 24 orders being excluded. Of the remaining 151 orders, 119 orders were completed within standards resulting in 78.8 percent of the service orders being completed.

In Frontier's response, it indicated that most of the service orders that missed the objective were in fact customer negotiated due dates or customer requests greater than three days. Staff did not have the complete order to review and was missing the page that showed the customer negotiated due date. Frontier provided staff with the extra page for the service orders and staff re-evaluated all the service orders. For the Molino exchange, 263 orders were completed within standards yielding 99.2 percent. All the quarters met the objectives. For the Walnut Hill exchange, 149 orders were completed within standards and this resulted in 98.7 percent. All the quarters reviewed for the Walnut Hill exchange met the objective. Table 5 contains the service order breakdown for each exchange and the quarter that was reviewed.

<b>Table 5 Availability of Service (Installation)</b>								
<b>Exchange</b>	<b>Quarter Reviewed</b>	<b>Total Orders Reviewed</b>	<b>Orders Excluded</b>	<b>Orders Delayed for Const.</b>	<b>Net Orders</b>	<b>Orders Completed w/i Std.</b>	<b>% of Orders Completed w/i Std.</b>	<b>90 % Std. Met?</b>
Molino	3 <sup>rd</sup> Qtr 06	88	0	10	78	76	97.4%	Y
	4 <sup>th</sup> Qtr 06	70	0	13	57	57	100%	Y
	1 <sup>st</sup> Qtr 07	72	0	9	63	63	100%	Y
	2 <sup>nd</sup> Qtr 07	76	0	9	67	67	100%	Y
Walnut Hill	3 <sup>rd</sup> Qtr 06	36	0	5	31	29	93.5%	Y
	4 <sup>th</sup> Qtr 06	51	0	6	45	45	100%	Y
	1 <sup>st</sup> Qtr 07	40	0	5	35	35	100%	Y
	2 <sup>nd</sup> Qtr 07	48	0	8	40	40	100%	Y

The same two exchanges were evaluated in 2001 for the third and fourth quarters of 2000. Those results indicated that Walnut Hill had met the standards with 92.6 percent and Molino did not meet the standards with 88.0 percent.

#### **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 200 customer loops in the Molino and Walnut Hill exchanges. The results indicated that 36 loops were unsatisfactory and 164 loops were satisfactory. The result for the overall subscriber loop evaluation is 82 percent, which is below the 98 percent standard. The main problem area for the loops was the high power influence reading.

During the 2001 service evaluation, 99.1 percent of the 116 loops that were tested met standards. However, power influence measurements were not considered into the percentage for

satisfactory loops. The “Previous Evaluation Deficiencies” section of the 2001 service evaluation report states, “staff found that 28 of 60 Molino loops and 30 of 56 Walnut Hill loops tested marginal or unsatisfactory for power influence.” The report concluded that power influence continues to be a problem across Frontier’s two exchanges. For 2007, Frontier’s overall percentage for subscriber loop transmission was 82 percent and high power influence readings are continuing to be a problem in the two exchanges.

In Frontier’s response, it stated “[T]he matter of [the] power influence [issue] is much more complex and requires coordination with the power company. Frontier has evaluated and begun repairs for all areas identified in the site evaluation as well as the entire exchange of Molino and Walnut Hill for power influence problems.” Table 6 contains the results for each exchange for the 2007 test year.

<b>Exchange</b>	<b>Total Loops Tested</b>	<b>Unsatisfactory</b>		<b>Satisfactory</b>		<b>98% Std. Met?</b>
		<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	
Molino	100	17	17%	83	83%	N
Walnut Hill	100	19	19%	81	81%	N
<b>Company Total</b>	<b>200</b>	<b>36</b>	<b>18%</b>	<b>164</b>	<b>82%</b>	

## **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 2,647 trouble reports in the Molino and Walnut Hill exchanges. Nine hundred and sixty three reports were excluded from the evaluation. Staff excluded reports if they concerned unregulated features, such as Voice Mail and Digital Subscriber Line (DSL), or if the customer canceled the trouble call. Of the remaining 1,684 reports reviewed, 1,393 reports were out-of-service reports and 291 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

third quarter of 2006, fourth quarter of 2006, first quarter of 2007, and second quarter of 2007 were 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 646 out-of-service reports for the Molino exchange. Of the reports originally reviewed, 539 were cleared within 24 hours. This exchange contains less than 50,000 access lines and staff aggregated the results. The Molino exchange did not meet the service standard for three out of the four quarters reviewed. The results, for the third quarter and fourth quarter of 2006, were 74.1 percent and 81.7 percent, respectively. For the first quarter 2007, the results were 95.6 percent; and for the second quarter 2007, they were 93.3 percent.

Initially, for the Walnut Hill exchange, staff reviewed 747 out-of-service reports and 614 reports were cleared within 24 hours. The exchange's results were 73.6 percent for the third quarter of 2006, 94.4 percent for the fourth quarter of 2006, 93 percent for the first quarter of 2007, and 92.5 percent for the second quarter of 2007.

Frontier stated, "a substantial number of tickets were marked as missed when the customer negotiated the appointment date outside of the 24 hours. While Frontier was outside the 24 hours, the customer's requested commitment date / time was met." Frontier also reviewed and implemented additional processes that should improve its time to repair the trouble tickets. Frontier stated that it would continue to monitor its results on a monthly basis and make changes if necessary.

Staff re-evaluated the trouble tickets for the customer-negotiated appointments that staff marked as missing the objective in the initial review. Of the 646 trouble tickets that staff reviewed for the Molino exchange, 589 of the tickets were cleared within the objective. This results in an overall percentage of 91.2 percent. Two quarters met the standard and two quarters did not meet the standards. For the Walnut Hill exchange, 669 trouble tickets met the objective out of the 747 out of service reports reviewed. This resulted in 89.6 percent overall. Table 7 reflects the exchanges containing less than 50,000 access lines, reported quarterly, the number of reports cleared within 24 hours, and whether or not the standard was met.

<b>Table 7 Out-of-Service Reports Restored Within 24 Hours</b>					
<b>Exchange</b>	<b>Quarter Reviewed</b>	<b>OOS Reports</b>	<b>Reports Cleared w/i 24 hrs.</b>	<b>% Cleared w/i 24 hrs</b>	<b>95% Std. Met?</b>
Molino	3 <sup>rd</sup> Qtr 06	266	224	84.2%	N
	4 <sup>th</sup> Qtr 06	126	117	92.9%	N
	1 <sup>st</sup> Qtr 07	90	87	96.7%	Y
	2 <sup>nd</sup> Qtr 07	164	161	98.2%	Y
Walnut Hill	3 <sup>rd</sup> Qtr 06	296	240	81.1%	N
	4 <sup>th</sup> Qtr 06	161	145	90.1%	N
	1 <sup>st</sup> Qtr 07	143	137	95.8%	Y
	2 <sup>nd</sup> Qtr 07	147	147	100%	Y
<b>Company Total</b>		<b>1393</b>	<b>1258</b>	<b>90.3%</b>	

During the 2001 service evaluation, staff reviewed 219 out-of-service repair reports for the same two exchanges. Both exchanges met the standards for clearing out-of-service reports within 24 hours. The percentages for the two exchanges reviewed were 99 percent and 96.5 percent. During this year's service evaluation, the percentages declined greatly from the previous evaluation.

#### **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 291 repair tickets for both exchanges. In the Molino exchange, 135 service-affecting reports out of 148 reports were cleared within 72 hours. The Walnut Hill exchange had 143 service affecting reports that were reviewed and 129 reports were cleared within 72 hours. Initially, both exchanges did not meet the service-affecting standard that requires exchanges to clear the service affecting reports within 72 hours. However, during the fourth quarter of 2006 and the second quarter of 2007, the Molino exchange met the standard. The Walnut Hill exchange only met the standard on the second quarter of 2007.

Based on supplemental information provided by Frontier, staff re-evaluated the trouble tickets for the appointments that were missed during the initial review. Frontier also mentioned in its response that during the months of August and September in 2006, there were frequent and severe storms with lightning strikes. Frontier indicated that in "August 2006, lightning struck a 200 pair cable and a 50 pair cable putting all customers out of service. The extreme weather conditions were a major factor in missing service commitments."

Staff performed a re-evaluation of the trouble tickets based upon additional information and determined that for the Molino exchange, 143 service-affecting tickets were restored within the objective. Three of the four quarters reviewed met the standards. This results in 96.6 percent over all for the Molino exchange. For Walnut Hill, staff found that 140 service-affecting tickets met the objective out of 143 service-affecting tickets reviewed. Walnut Hill achieved an overall percentage of 97.9 percent. Frontier's 2007 results are detailed in Table 8 for the four quarters that were reviewed.

<b>Table 8 Service Affecting Reports Restored Within 72 Hours</b>					
<b>Exchange</b>	<b>Quarter Reviewed</b>	<b>SA Reports</b>	<b>Reports Cleared w/i 72 hrs.</b>	<b>% Cleared w/i 72 hrs</b>	<b>95% Std. Met?</b>
Molino	3 <sup>rd</sup> Qtr 06	52	47	90.4%	<b>N</b>
	4 <sup>th</sup> Qtr 06	29	29	100%	<b>Y</b>
	1 <sup>st</sup> Qtr 07	23	23	100%	<b>Y</b>
	2 <sup>nd</sup> Qtr 07	44	44	100%	<b>Y</b>
Walnut Hill	3 <sup>rd</sup> Qtr 06	32	30	93.8%	<b>N</b>
	4 <sup>th</sup> Qtr 06	39	39	100%	<b>Y</b>
	1 <sup>st</sup> Qtr 07	37	36	97.3%	<b>Y</b>
	2 <sup>nd</sup> Qtr 07	35	35	100%	<b>Y</b>
<b>Company Total</b>		<b>291</b>	<b>283</b>	<b>97.3%</b>	

During Frontier's 2001 service evaluation, the two exchanges reviewed in the service affecting repair category did not meet standards. The percentages for the 2001 service evaluation were 92.6 percent and 94.4 percent.

### **C. Rebates**

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

In the event a subscriber's service is interrupted other than by a negligent or willful act of the subscriber and it remains out of service in the excess of 24 hours after being reported to the company, an appropriate adjustment or refund shall be made to the subscriber automatically, pursuant to Rule 25-4.110, F.A.C., (Customer Billing). Service interruption time will be computed on a continuous basis, Sundays and holidays included. Also, if the company finds that it is the customer's responsibility to correct the trouble, it must notify or attempt to notify the customer within 24 hours after the trouble was reported.

In reviewing the out-of-service reports for both exchanges, staff also ensures that rebates are being automatically credited to customers for their service being interrupted for longer than 24 hours. The rebates are reviewed by month instead of by quarter. Each month identified in Table 9 below, includes the rebates due for both exchanges. Table 9 also shows the number of rebates due for each month and the rebates that were automatically given. Frontier's rebate percentages range

from a low of 60 percent for the month of May 2007, to a high of 94.3 percent in January 2007. Frontier failed to provide the required out-of-service rebates for the twelve months that were reviewed.

Frontier indicated in its response, that it was “in the process of evaluating its billing system to determine a cause as to why some rebates were applied and others were not. This will require an extensive amount of research as a number of factors come into play when considering if a customer qualifies for a rebate.” Frontier also stated that it was “in the process of moving customers from the Frontier DPI billing system to the Citizens DPI billing system by the end of first quarter 2008. [Frontier has] identified rebates as a ‘gap’ with the transition team to ensure the functionality is correct at the time of transition.” The company defines “gap” as a “term used when there is functionality needed for one state but not necessarily for all states.” Frontier indicated that the “gap” has been the highest priority for the company.

<b>Table 9 Rebates</b>				
<b>Month</b>	<b>Rebates Due</b>	<b>Rebates Given</b>	<b>% Given</b>	<b>100% Std. Met?</b>
Jul – 06	30	27	90%	<b>N</b>
Aug – 06	66	58	87.9%	<b>N</b>
Sep – 06	74	59	79.7%	<b>N</b>
Oct – 06	26	19	73.1%	<b>N</b>
Nov – 06	21	15	71.4%	<b>N</b>
Dec – 06	28	21	75%	<b>N</b>
Jan – 07	35	33	94.3%	<b>N</b>
Feb – 07	13	8	61.5%	<b>N</b>
Mar – 07	8	6	75%	<b>N</b>
Apr – 07	12	10	83.3%	<b>N</b>
May – 07	10	6	60%	<b>N</b>
Jun – 07	16	14	87.5%	<b>N</b>
<b>Company Total</b>	<b>339</b>	<b>276</b>	<b>81.4%</b>	

During the 2001 service evaluation, the months of July through December 2000 were reviewed for the same two exchanges. Frontier did not provide 100 percent of the required rebates. Instead, Frontier provided zero percent of the rebates, missing all fifteen required rebates. The 2001 service evaluation report indicated, “The Company made ‘manual’ rebates since June 1999 when it hired a new Dispatcher. Frontier has reinstated the automatic rebate procedure and will issue the appropriate credits.”

In Frontier’s 2007 response, it indicated that it would be “moving customers from the Frontier DPI billing system to the Citizens DPI billing system by the end of the 1<sup>st</sup> quarter 2008.” The repair review covered the period of July 2006 through June 2007 before the billing system move and staff is concerned that the required automatic rebates do not appear to be properly credited to the affected customers. Staff requested that Frontier initiate a rebate investigation in order to determine how many customers were affected from August 2001, to the present. Once staff receives this information, a recommendation concerning the results of the rebate investigation and a refund plan will be filed with the Commission for approval.

## **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:

- Schedule 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
- 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 Frontier for the month of February.

Table 10 contains the reconciliation of the service evaluation results for answer time, availability of service, and repair within the 24 and 72 hours intervals with Frontier's filed reports. There was originally a difference of eleven items. After staff re-evaluated the service orders and repair tickets, the difference changed to five items. Staff also verifies whether the reports are forwarded in a timely manner. Frontier did file its periodic report on time.

In its response, Frontier indicated that the discrepancies between the service evaluation and the periodic report were due to the explanations that were given for the section III; Availability of Service and section V; Repair Service Summary. After re-evaluating the service orders and repairs tickets, the differences between the service evaluation and the periodic report did change.



<b>Table 10 Periodic Report Review</b>					
<b>Item Reviewed</b>	<b>Exchange</b>	<b>Month</b>	<b>Std. Met per Periodic Report</b>	<b>Std. Met per Service Eval.</b>	
<b>Answer Time</b> Business Office Repair Service		August 2007	Y	Y	
		August 2007	Y	Y	
<b>Availability of Service</b>	Molino	3 <sup>rd</sup> Qtr 2006	Y	Y	
		4 <sup>th</sup> Qtr 2006	Y	Y	
		1 <sup>st</sup> Qtr 2007	Y	Y	
		2 <sup>nd</sup> Qtr 2007	Y	Y	
	Walnut Hill	3 <sup>rd</sup> Qtr 2006	Y	Y	
		4 <sup>th</sup> Qtr 2006	Y	Y	
		1 <sup>st</sup> Qtr 2007	Y	Y	
		2 <sup>nd</sup> Qtr 2007	Y	Y	
		<b>Repair Service – OOS 24 Hours</b>			
		Molino	3 <sup>rd</sup> Qtr 2006	N	N
4 <sup>th</sup> Qtr 2006	N		N		
1 <sup>st</sup> Qtr 2007	N		Y		
2 <sup>nd</sup> Qtr 2007	Y		Y		
Walnut Hill	3 <sup>rd</sup> Qtr 2006	N	N		
	4 <sup>th</sup> Qtr 2006	N	N		
	1 <sup>st</sup> Qtr 2007	N	Y		
	2 <sup>nd</sup> Qtr 2007	Y	Y		
<b>Repair Service – SA 72 Hours</b>					
Molino	3 <sup>rd</sup> Qtr 2006	N	N		
	4 <sup>th</sup> Qtr 2006	N	Y		
	1 <sup>st</sup> Qtr 2007	N	Y		
	2 <sup>nd</sup> Qtr 2007	Y	Y		
Walnut Hill	3 <sup>rd</sup> Qtr 2006	N	N		
	4 <sup>th</sup> Qtr 2006	N	Y		
	1 <sup>st</sup> Qtr 2007	Y	Y		
	2 <sup>nd</sup> Qtr 2007	Y	Y		
<b>Comparison between Periodic Report &amp; Service Evaluation</b>	<b>Items Reviewed</b>	<b>Items that are the Same</b>	<b>Items that are Different</b>	<b>% of Same Items</b>	
	26	21	5	80.8%	

## 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 195 loops for ground deficiencies in the two exchanges during the 2007 service evaluation. Staff notes that subscriber loops can have a common ground or shared ground. This accounts for the differences in the number of loops tested for transmission (200) and the number of loops tested for ground deficiencies (195). Thirty-seven loops were new installations for service and 158 loops were randomly tested. Eleven loops were found to have poor grounds. Of the loops found to have poor grounds, three loops were new installations and eight loops were of the randomly tested category. For the newly installed loops, the standard is 100 percent of the loops must have proper grounding. The Walnut Hill exchange failed to meet the grounding standard for new installs.

In the randomly tested category, the grounding standard is 92 percent and the Molino exchange exceeded the grounding standard. However, the number of random loops with poor grounds in the Walnut Hill exchange did not meet the grounding standard. Table 11 contains the subscriber loops ground test results for each exchange for 2007.

Frontier’s response concerning the grounding deficiencies states, “An evaluation of the loops revealed [that the] grounding issues [were] primarily open cable shields, open bonds, and ungrounded pedestals.” All grounding issues in both exchanges have been corrected.

<b>Table 11 Safety – Ground Deficiencies</b>				
<b>Exchange</b>	<b>Loops Tested</b>	<b>Poor Grounds</b>	<b>Adequate Grounds %</b>	<b>Std. Met?</b>
<b>New Installs</b>				<b>Std. = 100.0%</b>
Molino	16	0	100%	Y
Walnut Hill	21	3	85.7%	N
<b>Company Total</b>	<b>37</b>	<b>3</b>	<b>91.9%</b>	
<b>Random Loops</b>				<b>Std. = 92.0%</b>
Molino	80	1	98.8%	Y
Walnut Hill	78	7	91%	N
<b>Company Total</b>	<b>158</b>	<b>8</b>	<b>94.9%</b>	

During the 2001 service evaluation, staff tested 21 loops for new installation of service. Six loops had poor grounds. This was 71.4 percent for new installs. Staff also tested 95 random loops for Frontier's customers in 2001. Ten loops had a poor ground, resulting in 89.5 percent of loops with proper grounds.

## **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 Frontier's network. For the two exchanges tested, Frontier did not provide Intra-LATA service or Extended Calling Service (ECS). Frontier only provides local calling in Florida, which is a benefit for its customers.

During Frontier's service evaluation in 2001, the 1+ Intra-LATA test calls were conducted. Staff made 359 calls over Frontier's network. Frontier underbilled all the calls made. Staff concluded that Frontier did not bill per tariff. In 2007, Frontier changed the calling scope to benefit its customers. Instead of charging its customers for toll calls in the surrounding areas, Frontier charges local calling for the two exchanges. The change in calling scope eliminated the 1+ Intra-LATA testing for 2007.

## **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. Frontier did not charge for the calls made on the TDD line, which is correct. On the other line, staff made thirteen calls. According to Frontier's tariff, there are three allowances or no charge applies for the first three calls per month per individual line. Therefore, the billable calls are ten calls. Frontier billed for two of the calls. This results in 20 percent, which is below the standard of 97 percent. As mentioned in the New Number in Directory Assistance section, Frontier was relying on a third party vendor to update the DA database and is in process of handling the updates itself. Frontier believes the billing was affected by this change and it is still researching the other DA calls that were not billed.

The bills for the DA calls showed \$0.30 per call. Frontier's tariff shows that the price for a DA call is \$0.30 per call. Staff concluded that Frontier billed per tariff for the DA calls.

Frontier stated "The re-homing of Directory Assistance Service to [the New York] office resulted in unforeseen issues with updates to [its] DA database and capturing DA calls for billing purposes." Frontier indicates that the research to determine why the calls were not billed would be extensive. Frontier mentioned, "A switch dump to identify the two lines used for testing to confirm the call was captured and reported to billing would also be necessary." Frontier notes that this resulted in calls not being charged and that it is lost revenue. Frontier stated ". . . we feel [it] is better to absorb [the loss] than spend a great deal of time trying to explain a problem that we

believe has been corrected with the re-homing.” Table 12 details Frontier’s directory assistance results.

<b>Table 12 Timing and Billing – Directory Assistance</b>									
<b>Central Office</b>	<b>Telephone Number</b>	<b>Calls Made</b>	<b>Allowance</b>	<b>Billable Calls</b>	<b>Calls Billed</b>	<b>Variance</b>	<b>Percent Correctly Billed</b>	<b>97 % Std. Met?</b>	<b>Billed per Tariff</b>
Molino	350-587-4276	13	3	10	2	8	20%	N	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 Molino exchange, staff made 150 voice calls and 50 TDD calls to 911 emergency services. There were no failures for both the voice and TDD calls. For Frontier’s review, this results in a 100 percent completed call rate for the TDD calls and 100 percent completion of calls to 911 emergency services for the voice calls.

During the 2001 service evaluation, 100 percent of the voice calls to 911 over Frontier’s network were completed and the TDD calls also had a 100 percent completion.

<b>Table 13 911 Emergency Service</b>							
<b>Area</b>	<b>NXX</b>	<b>Calls Made</b>	<b>Busy Calls</b>	<b>Failed Calls</b>	<b>Calls Completed</b>	<b>% of Calls Completed</b>	<b>100 % Std. Met?</b>
<b>Voice Calls</b>							
Molino	587	150	0	0	150	100%	
Company Total		150	0	0	150	100%	<b>Y</b>
<b>TDD Calls</b>							
Molino	587	50	0	0	50	100%	
Company Total		50	0	0	50	100%	<b>Y</b>