



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

SMART CITY TELECOMMUNICATIONS, LLC

Celebration and Lake Buena Vista Exchanges

February 12 - 16, 2007

Division of Competitive Markets & Enforcement

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Report on Telecommunications Service Quality

For

Smart City Telecommunications, 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 Smart City Telecommunications, LLC (Smart City), during the period of February 12 - 16, 2007. The exchanges reviewed were Celebration and Lake Buena Vista. 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 Smart City was in 1999. 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), F.A.C., Answering Time states:

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

Staff conducted 55 calls to Smart City’s business office and repair service center respectively. These calls were voice calls and Smart City did not utilize a menu driven, automated, interactive answering system. According to the rule above, the standard for the business office is 80 percent and the repair service is 90 percent of the calls should be answered within 30 seconds. Additionally, staff made 47 calls using a Telecommunications Device for the Deaf (TDD) to both the business office and repair service.

During the 1999 service evaluation, Smart City answered 82 percent of the business office voice calls within standards and answered 87.5 percent of the business office TDD calls within standards. As Table 1 indicates, Smart City made an improvement for both the voice and TDD calls for the business office during the 2007 service evaluation.

Type of Calls	Total Calls	Calls Failed	Calls Answered	Calls Answered w/i Std.	% Answered	% Answered w/i Std.	80% Std. Met?
Voice	55	0	55	53	100%	96.4%	Y
TDD	47	0	47	44	100%	93.6%	Y

Table 2, Answer Time – Repair Service, illustrates that Smart City answered 98.2 percent of the voice calls within the allotted time exceeding the answer time standard. TDD calls were answered within 91.5 percent, also exceeding the rule standard. During the 1999 service evaluation, Smart City answered 92.2 percent of the voice calls to repair service and answered 100 percent of the TDD calls exceeding the 90 percent standard.

Type of Calls	Total Calls	Calls Failed	Calls Answered	Calls Answered w/i Std.	% Answered	% Answered w/i Std.	90% Std. Met?
Voice	55	0	55	54	100%	98.2%	Y
TDD	47	0	47	43	100%	91.5%	Y

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 of the business office of the incumbent telecommunications provider.

Staff reviewed twenty-one items from the Smart City telephone directory. One item was incorrect in the directory because the telephone directory shows \$0.25 for the Directory Assistance (DA) charges, while Smart City’s tariff states the charge is \$0.35.

Staff notes that, during the last evaluation, Smart City’s telephone directory listed the same price for the DA charges as was listed in its tariff. This year the DA charges are incorrect.

In the response to the draft report, Smart City stated that it is in process of updating the telephone directory. This change will reflect the current directory assistance charge that is listed in its tariff. The directory should be made available for its customers in January 2008.

Table 3 Directory Reviewed

Name/ Date of Directory	Total Items Reviewed	Items in Compliance with Std.	% of Items in Compliance with Std.	100% Std. Met?
Lake Buena Vista & Celebration / January 2007	21	20		
Company Total	21	20	95.2%	N

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 multiple requests per call. Smart City's directory assistance found all 11 of the requested numbers. Table 4 represents the DA test results indicating Smart City met the standard.

During the last service evaluation, Smart City found 89.5 percent of new numbers in the directory assistance database. This year, the percentage increased to 100 percent of new numbers being found in the directory assistance database.

Table 4 New Numbers in Directory Assistance				
Calls made to DA	Requests for Numbers	Total Found in DA	% Found in DA	99% Std. Met?
11	11	11	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.

Two exchanges were reviewed during the evaluation: Celebration and Lake Buena Vista. At the time of the evaluation, both exchanges had less than 50,000 access lines and the service order numbers reported to the Commission were small; therefore, staff requested the service orders for July 1 - December 31, 2006.

During the evaluation, staff reviewed the third and fourth quarter of 2006 for the Celebration exchange. Five orders were excluded because the connection of the service occurred the month before the order was closed. Orders are also excluded when there is a delay for construction of facilities to provide service to the end user; for example, if the customer is in a brand new neighborhood and there are no facilities available. The net number of orders for the Celebration exchange was 330. Out of the net orders, 312 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 94.5 percent of service orders being completed within the 90 percent standards, indicating that Smart City exceeded the service order standard.

Staff reviewed 38 orders for the Lake Buena Vista exchange with one order being excluded. All of the 37 net orders were completed within standards resulting in 100 percent compliance. The same two exchanges were evaluated in 1999. Those results indicated the exchanges met standards. Staff notes the 2007 results for these exchanges exceed the standard. Table 5 contains the service order breakdown for each exchange.

Table 5 Availability of Service (Installation)								
Exchange	Qtr.	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?
Celebration	3 rd Qtr 06 Total	190	2	0	188	179	95.2%	Y
Celebration	4 th Qtr 06 Total	145	3	0	142	133	93.7%	Y
Lake Buena Vista	3 rd Qtr 06 Total	16	1	0	15	15	100%	Y
Lake Buena Vista	4 th Qtr 06 Total	22	0	0	22	22	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. In addition, if two or more measurements fall within the marginal range for loop current, decibel loss, or metallic noise, the loop is considered to be unsatisfactory and should be referred to maintenance for repair.

Staff tested 141 customer loops in the Celebration and Lake Buena Vista exchanges. The results indicated that no loops were unsatisfactory. Thirty-one loops were marginal, where a loop measurement fell below acceptable readings for loop current, loop line loss or noise, and 110 loops were satisfactory. The result for the overall subscriber loop evaluation is 100 percent. Table 6 contains the results for each exchange for the 2007 test year.

During the 1999 service evaluation, 100 percent of the 24 loops that were tested met standards. This year, Smart City maintained the same 100 percent loop transmission results.

Table 6 Subscriber Loops – Transmission									
Area	Total Loops Tested	Unsatisfactory		Marginal		Satisfactory		Total %	98% Std. Met?
		Number	%	Number	%	Number	%		
Celebration	104	0	0%	14	13.5%	90	86.5%		
Lake Buena Vista	37	0	0%	17	45.9%	20	54.1%		
Company Total	141	0	0%	31	22%	110	78%		
Marginal + Satisfactory								100%	Y

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 277 trouble reports in the Celebration and Lake Buena Vista exchanges. Nineteen 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 258 reports reviewed, 220 reports were out-of-service reports and 38 reports were service affecting reports. As stated in the Availability of Service section of this report, Celebration and Lake Buena Vista had less than 50,000 access lines; therefore, the third and fourth quarters of 2006 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 187 out-of-service reports for the Celebration exchange for the third and fourth quarters of 2006. Of the reports reviewed, 181 reports were cleared within 24 hours. The Celebration exchange contains less than 50,000 access lines, and staff aggregated its results for the third and fourth quarter of 2006. In the third quarter, the results were 99.1 percent, exceeding the standard; however, the fourth quarter percentage is 92.9 percent, which does not meet the standard.

In the Lake Buena Vista exchange, for the third and fourth quarters, staff reviewed 33 out-of-service reports. The Lake Buena Vista exchange cleared 31 reports within 24 hours. Staff notes that the Lake Buena Vista exchange also contains less than 50,000 access lines and requires analysis on a quarterly aggregated basis. The third quarter results were 95.7 percent, exceeding the standard; however, the Lake Buena Vista exchange did not meet the standard for the fourth quarter. Its results were 90 percent.

During the 1999 service evaluation, staff reviewed 114 out-of-service repair reports for the same two exchanges for six months. Both exchanges failed to meet standards. The percentages for the two exchanges reviewed were 90 percent and 92.2 percent. During this year's service evaluation, the percentages did improve slightly from the previous evaluation. Table 7 is a listing reflecting the exchanges containing less than 50,000 access lines, reported quarterly, and the number of reports cleared within 24 hours. The two exchanges did not meet the 95 percent standard for the fourth quarter of 2006, but both exchanges met the standards for the third quarter of 2006.

Smart City stated in its response to the draft report that one out-of-service trouble ticket caused the Celebration exchange to miss the 95 percent standard for the fourth quarter 2006. The ticket was repaired within twenty-four hours but not formally closed until after the twenty-four hours. Smart City reinforced with its technical staff the need for timely closing of all trouble tickets. The customer did receive a rebate because the ticket was open longer than twenty-four hours. The reason the Lake Buena Vista exchange missed the 95 percent standard for the fourth quarter 2006, was because of one ticket. In this case, Smart City was not aware that Saturdays counted as a business day for repair purposes. Smart City stated that it did not react accordingly to meet the 95 percent standard. Smart City has adjusted its processes and procedures so that Saturdays are now included as a business day for repair purposes so that out-of-service resolutions are handled in a timely manner.

Table 7 Out-of-Service (OOS) Reports Restored Within 24 Hours					
Exchange	Qtr.	OOS Reports	Reports Cleared w/i 24 hrs.	% Cleared w/i 24 hrs	95% Std. Met?
Celebration	3 rd Qtr 06 Total	117	116	99.1 %	Y
Celebration	4 th Qtr 06 Total	70	65	92.9 %	N
Lake Buena Vista	3 rd Qtr 06 Total	23	22	95.7 %	Y
Lake Buena Vista	4 th Qtr 06 Total	10	9	90%	N
Company Total		220	212	96.4%	

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.

Staff reviewed 36 service affecting reports for the Celebration exchange for the third and fourth quarter of 2006. Thirty-six reports were cleared within 72 hours. This results in 100 percent compliance, which is above the 95 percent standard. For the Lake Buena Vista exchange, two service affecting reports were reviewed and the two reports were cleared within 72 hours. This is 100 percent compliance, which is also above the standard.

During Smart City's 1999 service evaluation, both exchanges in the service affecting (SA) repair category met standards. For the third and fourth quarters of 2006, the results indicate Smart City exceeded the standard in both of the exchanges. The percentages for the 1999 service evaluation were 100 percent and 96.8 percent respectively. In the 2007 evaluation, the

percentages for both exchanges are 100 percent. Table 8 details staff's review of the SA reports by exchange.

Table 8 Service Affecting (SA) Reports Restored Within 72 Hours					
Exchange	Qtr	SA Reports	Reports Cleared w/i 72 hrs.	% Cleared w/i 72 hrs	95% Std. Met?
Celebration	3 rd Qtr 06 Total	17	17	100%	Y
Celebration	4 th Qtr 06 Total	19	19	100%	Y
Lake Buena Vista	3 rd Qtr 06 Total	2	2	100%	Y
Lake Buena Vista	4 th Qtr 06 Total	0	0	N/A	N/A
Company Total		38	38	100%	

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 the month of July 2006, staff determined that no rebates were owed to customers for their service being interrupted for longer than 24 hours. For the month of August 2006, staff found three rebates were due and that all three rebates were given, resulting in 100 percent compliance. In the month of September 2006, staff found no rebates were due to customers. Smart City gave the one rebate that was due to a customer in October 2006, resulting in 100 percent. For November 2006, staff found that no rebates were due to customers. For the month of December 2006, staff determined that five rebates were due to customers. Smart City remitted all five rebates to the customers, resulting in 100 percent compliance.

During the 1999 service evaluation, Smart City did not provide 100 percent of the required rebates for the six months reviewed. Instead, Smart City provided 90 percent of the rebates, missing one rebate out of ten. For the 2007 evaluation, Smart City's percentages for the automatic rebates during the months reviewed were 100 percent. Table 9 details the percentages by month.

Table 9 Rebates				
Month	Rebates Due	Rebates Given	% Given	100% Std. Met?
Jul - 06	0	0		
Aug - 06	3	3	100%	Y
Sep - 06	0	0		
3 rd Qtr Total	3	3	100%	Y
Oct - 06	1	1	100%	Y
Nov - 06	0	0		
Dec - 06	5	5	100%	Y
4 th Qtr Total	6	6	100%	Y

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 Smart City for the month of February.

Table 10 indicates the results of staff's reconciliation of the evaluation test results and Smart City's filed reports. There was a difference of two items. Staff also reviews these reports to ensure they are forwarded in a timely manner. Smart City did file its periodic report on time.

Smart City stated that the two items that were different from the evaluation test results and Smart City's filed reports are the same two items that were mentioned in Out-of-Service Restored Within 24 Hours section. For the Celebration exchange, one trouble ticket caused the exchange to miss the 95 percent standard. The ticket was repaired within twenty-four hours but not formally closed until after the twenty-four hour time period had elapsed. One ticket caused the Lake Buena Vista exchange to miss the 95 percent standard. Smart City did not count Saturdays as a business working day for repair trouble tickets and it did not react to repair the ticket within the twenty-four hour time period. These items were reported incorrectly in the applicable Periodic Report, and the corrective actions noted in the Out-of-Service Restored Within 24 Hours section were taken.

Table 10 Periodic Report Review				
Item Reviewed	Exchange	Month / Qtr	Std. Met per Periodic Report	Std. Met per Service Eval.
Answer Time Business Office Repair Service		February 2007	Y	Y
		February 2007	Y	Y
Availability of Service	Celebration Lake Buena Vista	3 rd Qtr 2006	Y	Y
		3 rd Qtr 2006	Y	Y
	Celebration Lake Buena Vista	4 th Qtr 2006	Y	Y
		4 th Qtr 2006	Y	Y
Repair Service – OOS 24 Hours	Celebration Lake Buena Vista	3 rd Qtr 2006	Y	Y
		3 rd Qtr 2006	Y	Y
	Celebration Lake Buena Vista	4 th Qtr 2006	Y	N
		4 th Qtr 2006	Y	N
Repair Service – SA 72 Hours	Celebration Lake Buena Vista	3 rd Qtr 2006	Y	Y
		3 rd Qtr 2006	Y	Y
	Celebration Lake Buena Vista	4 th Qtr 2006	Y	Y
		4 th Qtr 2006	Y	N/A
Comparison between Periodic Report & Service Evaluation	Items Reviewed	Items that are the Same	Items that are Different	% of Same Items
	13	11	2	84.6%

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 Codes gives specific guidance about grounding telephone systems. Proper grounding of the subscriber loop helps protect the subscribers and their property.

Staff tested 142 loops in the two exchanges during the 2007 service evaluation. Fourteen loops were new installations for service and 128 loops were randomly tested. Eleven of the loops were found to have poor grounds. Of the loops found to have poor grounds, one loop was a new installation for service and ten loops were of the randomly tested category. Of 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. Of the ten randomly tested loops with poor grounds, eight loops were from one area in Lake Buena Vista. Smart City worked diligently to correct all the grounding deficiencies for the loops in that area. Staff was able to retest those loops and, after the retesting, the loops had proper grounds. Additionally, Smart City corrected all of the other ground deficiencies identified during the 2007 evaluation and provided staff the new results before the draft report was issued.

During the 1999 service evaluation, staff tested five loops for new installation of service. All the loops had proper grounds. This was 100 percent for new installs compared to this year's 92.9 percent for new installs. Staff also tested 19 random loops for Smart City's customers in 1999. One loop had a poor ground, resulting in 94.7 percent of loops with proper grounds. Of the 128 random loops that staff tested this year, only ten loops had poor grounds. This is 92.2 percent compliance, which is above the 92 percent standard.

Exchange	Loops Tested	Poor Grounds	Adequate Grounds %	Std. Met?
New Installs				Std. = 100.0%
Celebration	11	1	90.9%	
Lake Buena Vista	3	0	100%	
Company Total	14	1	92.9%	N
Random Loops				Std. = 92.0%
Celebration	94	1	98.9%	
Lake Buena Vista	34	9	73.5%	
Company Total	128	10	92.2%	Y

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 were generated to measure the timing of local toll calls or Intra-LATA calls for billing purposes. These tests were precisely timed to ensure that the elapsed times were the same for each series of calls. To evaluate the accuracy of Smart City's network, all test calls were 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 were 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 made 140 1+ Intra-LATA test calls over Smart City's network. There were multiple timing and billing discrepancies found. Staff's test resulted in 55 percent compliance for the timing accuracy and 92.1 percent compliance for the billing accuracy. Smart City did not offer an Intra-LATA calling card, so this test was not performed. Staff also verifies whether or not Smart City is billing per its tariff, which means the price and timing of calls on the bill match what is listed in its tariff. During the 2007 evaluation, Smart City did not bill according to its tariff filed with the Commission.

In the response to the draft report, Smart City stated the timing and billing discrepancies were associated with the test line that staff used to make the test calls. Smart city indicated that it reviewed the bills for the test calls before sending them to staff and found an incorrect Primary Interexchange Carrier (PIC) code on the line. Smart City corrected the PIC code and manually re-rated the calls to produce the bill. This bill was sent to staff to use for the evaluation. Smart City researched the bill after receiving the draft report and realized the manual effort to correct the bill caused different problems. The company found that the original timing of the seconds and minutes was not cleared out, so the bill contained incorrect data and thus inappropriately indicated that Smart City had existing timing and billing issues with 1+ IntraLATA toll. Smart City does not believe it has any timing or billing problems.

In Smart City's response to the draft report, the company provided staff with a sample of customers' bills prior to the time that staff evaluated the 1+ IntraLATA toll and after the time staff made its test calls. The bills indicated that Smart City correctly timed and billed the IntraLATA 1+ toll calls for these customers. Smart City pulled the Automatic Message Accounting (AMA)

files for staff's test line. These files are the automatic billing records, with call usage information, used to generate the bills for a telephone line. Smart City corrected the PIC code on the files and re-ran the original records through its billing system to produce a new bill for staff. Staff re-rated the test calls using this new bill. Table 12 details staff's timing and billing analysis for Smart City's IntraLATA 1+ toll calls. Based upon the copies of Smart City's bills and the analysis of the subsequent bill for the test calls, staff changed its findings for the IntraLATA 1+ timing and billing results indicating that Smart City exceeded the standards in 2007.

During Smart City's service evaluation in 1999, the 1+ Intra-LATA test calls were not conducted. Because the tests were not done in 1999, there are no results to compare with this year's evaluation results.

Table 12 Timing and Billing – Intra-LATA					
	Number of Calls	Calls Undertimed	Calls Overtimed	% Correctly Timed	97% Std. Met?
Timing Accuracy					
1+	140	0	0	100%	Y
	Number of Calls	Calls Underbilled	Calls Overbilled	%Correctly Billed	97% Std. Met?
Billing Accuracy					
1+	140	0	0	100.0%	Y
Billing Per Tariff					Yes or No
1+					Y

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. Smart City did not charge for the calls made on the TDD line, which is correct. On the other line, staff made fifteen calls. According to Smart City’s tariff, the allowance is three free calls for one line for one billing cycle. The billable calls are twelve calls. Smart City billed for twelve calls. This results in 100 percent, which is above the standard of 97 percent.

In reviewing the bills for DA calls, staff noticed that two of the twelve calls were billed as National DA calls instead of Local DA calls. All DA calls that were made were local DA calls. Smart City is investigating as to why the two calls were billed as National DA calls. Even though there were two calls billed as National DA, staff still concluded that Smart City billed per tariff for the DA calls. Both the local DA calls and the national DA calls were billed at the rate that is listed in Smart City’s tariff.

Table 13 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
Lake Buena Vista	407-828-8033	15	3	12	12	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 Lake Buena Vista exchange, staff made 58 voice calls and 44 TDD calls to 911 emergency services. There were no busy calls or failed calls. For Smart City’s review, this results in 100 percent completed calls to 911 emergency services for both voice calls and TDD calls.

During the 1999 service evaluation, 100 percent of the voice calls to 911 over Smart City’s network were completed and the TDD calls also had 100 percent completion.

Table 14 911 Emergency Service							
Area	NXX	Calls Made	Busy Calls	Failed Calls	Calls Completed	% of Calls Completed	100 % Std. Met?
Voice Calls							
Lake Buena Vista	828	58	0	0	58	100%	
Company Total		58	0	0	58	100%	Y
TDD Calls							
Lake Buena Vista	828	44	0	0	44	100%	
Company Total		44	0	0	44	100%	Y