



REPORT ON TELECOMMUNICATIONS  
SERVICE QUALITY

For

SMART CITY TELECOMMUNICATIONS, LLC

Lake Buena Vista Exchange

*February 12 - 16, 2007*

Division of Competitive Markets & Enforcement

June 1, 2007

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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 service quality evaluations of the telecommunications services provided by Interexchange Companies (IXCs) operating within the state of Florida. Section 364.08(1), Florida Statutes, mandates that "A telecommunications company may not charge, demand, collect, or receive for any service rendered or to be rendered any compensation other than the charge applicable to such service as specified in its schedule on file and in effect at that time. A telecommunications company may not refund or remit, directly or indirectly, any portion of the rate or charge so specified or extend to any person any advantage of contract or agreement or the benefit of any rule or regulation or any privilege or facility not regularly and uniformly extended to all persons under like circumstances for like or substantially similar service."

The service evaluation objectives are (1) to evaluate a company's timing and billing through a series of automated test calls; and (2) to verify that a company is billing according to its tariff or a price list on file with the Commission.

Staff performed a service evaluation on Smart City Telecommunications, LLC (Smart City), during the period of February 12 - 16, 2007. The test calls were conducted at a central office of the Lake Buena Vista exchange and included testing and subsequent analysis of the following areas:

- Inter-LATA 1+ Timing Accuracy
- Inter-LATA 1+ Billing Accuracy
- Inter-LATA 1+ Billing per Tariff
- Inter-LATA Calling Card Timing Accuracy
- Inter-LATA Calling Card Billing Accuracy
- Inter-LATA Calling Card Billing per Tariff

Rule 25-24.485(g), Florida Administrative Code, states, "Companies shall charge only the rates contained in their tariff." This rule applies to all sections of an evaluation.

During the service evaluation, a series of test calls were generated to measure the timing of toll calls for billing analysis. These tests were precisely timed to ensure that the elapsed times were the same for each carrier's series of calls. To evaluate the accuracy of each IXC, all test calls were completed using a computerized timing tester. Normally, calls are completed at each of the following timing intervals: 183, 182, 181, 180, 179, 178, 123, 122, 121, 120, 119, 118, 63, 62, 61, 60, 59, and 58 seconds.

Bills for these calls were analyzed and compared to the records generated by the tests for origination and time duration to develop the timing and billing accuracy summary. While the accuracy of our tests can be measured in hundredths of a second, we allow the company a tolerance of plus or minus one second.

**I. Inter-LATA 1+ Timing Accuracy**

Staff made 138 1+ test calls over Smart City’s network to verify the timing accuracy. The test calls were made to numbers outside the Lake Buena Vista exchange and outside the Orlando LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that Smart City correctly timed all the calls yielding a 100 percent timing accuracy for 1+ calls. Smart City met the 97 percent timing accuracy objective.

| <b>Table 1 Inter-LATA 1+ Timing Accuracy</b> |                              |                                   |                                  |   |                          |
|--|------------------------------|-----------------------------------|----------------------------------|---|--------------------------|
|  | <b>Total Number of Calls</b> | <b>Number of Calls Undertimed</b> | <b>Number of Calls Overtimed</b> | <b>Percent of Calls Correctly Timed</b> | <b>97% Objective Met</b> |
| <b>Timing Accuracy</b>                       |                              |                                   |                                  |   |                          |
| 1+   | 138                          | 0                                 | 0                                | 100.0%                                  | <b>Y</b>                 |

**II. Inter-LATA 1+ Billing Accuracy**

The test calls that were evaluated for timing accuracy, found in Table 1, were used to verify the 1+ billing accuracy found in Table 2. Smart City billed all the calls correctly. This resulted in 100 percent billing accuracy and therefore Smart City met the 97 percent billing accuracy objective.

| <b>Table 2 Inter-LATA 1+ Billing Accuracy</b> |                              |                                    |                                   |  |                          |
|---|------------------------------|------------------------------------|-----------------------------------|--|--------------------------|
|   | <b>Total Number of Calls</b> | <b>Number of Calls Underbilled</b> | <b>Number of Calls Overbilled</b> | <b>Percent of Calls Correctly Billed</b> | <b>97% Objective Met</b> |
| <b>Billing Accuracy</b>                       |                              |                                    |                                   |  |                          |
| 1+  | 138                          | 0                                  | 0                                 | 100.0%                                   | <b>Y</b>                 |

**III. Inter-LATA 1+ Billing per Tariff**

Of the 138 1+ test calls, Smart City billed and timed all of the calls according to its tariff. Staff concludes that Smart City billed per tariff.

#### IV. Inter-LATA Calling Card Timing Accuracy

Staff made 112 calling card test calls over Smart City’s network to verify the timing accuracy. The test calls were made to numbers outside the Lake Buena Vista exchange and outside the Orlando LATA utilizing Smart City’s calling card. Smart City overtimed 59 calls and timed 53 calls correctly. This resulted in a 47.3 percent timing accuracy for its calling card calls and therefore it did not meet the 97 percent objective.

In Smart City’s response to the overtiming of the calling card calls, Smart City corrected the timing program on May 21, 2007. The calling card program now times in six second increments after a minimum call duration of thirty seconds as its tariff states. During staff’s test calls, the calling card program was timing in one minute increments.

|                        | <b>Total Number of Calls</b> | <b>Number of Calls Undertimed</b> | <b>Number of Calls Overtimed</b> | <b>Percent of Calls Correctly Timed</b> | <b>97% Objective Met</b> |
|------------------------|------------------------------|-----------------------------------|----------------------------------|---|--------------------------|
| <b>Timing Accuracy</b> |                              |                                   |                                  |   |                          |
| Calling Card           | 112                          | 0                                 | 59                               | 47.3%                                   | N                        |

#### V. Inter-LATA Calling Card Billing Accuracy

The same calls that were made for the calling card timing accuracy were also used to verify the calling card billing accuracy. Smart City overbilled the same 59 calls that were overtimed and correctly billed the remaining 53 calls. This resulted in a 47.3 percent billing accuracy. Smart City did not meet the 97 percent objective.

In addition to identifying the timing problem, Smart City researched from October 11, 2003, the effective date of its calling card tariff, through the present, to identify the customers who used the calling card and were overbilled. Smart city found seven customers used the calling card service during the period researched and the total amount that was overbilled was \$24.52. Smart City has issued credits to each of the seven customers affected.

|                         | <b>Total Number of Calls</b> | <b>Number of Calls Underbilled</b> | <b>Number of Calls Overbilled</b> | <b>Percent of Calls Correctly Billed</b> | <b>97% Objective Met</b> |
|-------------------------|------------------------------|------------------------------------|-----------------------------------|--|--------------------------|
| <b>Billing Accuracy</b> |                              |                                    |                                   |  |                          |
| Calling Card            | 112                          | 0                                  | 59                                | 47.3%                                    | N                        |

#### VI. Inter-LATA Calling Card Billing per Tariff

Of the 112 calling card test calls that staff conducted, Smart City overcharged and overtimed 59 of the calls. Staff concludes that Smart City did not bill according to its tariff.