LAW OFFICES MESSER, CAPARELLO & SEEECENED-FPSC A PROFESSIONAL ASSOCIATION

> 215 SOUTH MONROE STREET. SUITE 701 POST OFFICE BOX 1876 TALLAHASSEE, FLORIDA 32302-1876 TELEPHONE: (850) 222-0720

TELEPHONE: (850) 222-0720 TELECOPIERS (850) 284-4358; (850) 425-1842 98 JUL 13 PM 4:05

RECONUS AND REPORTING

July 13, 1998

BY HAND DELIVERY

Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 951232-T1

Dear Ms. Bayo:

Enclosed for filing in the captioned docket is an original and fifteen copies of revised page 13 of Mr. Douglas S. Metcalf's Direct Testimony and Revised Exhibit DSM-1 to be substituted for the pages originally filed on June 26, 1998.

In reviewing Mr. Metcalf's prefiled testimony and Exhibit DSM-1 after their filings, Mr. Metcalf discovered that his exhibit inadvertently reflected three incorrect numbers in Column C for March to May 1992. The effect of this error when flowed through the spreadsheet was to overstate the total amount due by TSI to Transcall by \$17,228.45. In applying this correction, this resulted in charges to the three numbers reported on page 13, lines 13, 15, and 24 of Mr. Metcalf's prefiled direct testimony. We apologize for any confusion caused by this error.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

CAF Thank you for your assi	istance with this filing.
CTR	Sincerely, 1
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OPCFRS/amb	1 8
RCHEnclosure	RECEIVED & FILED
SEC Mr. Brian Sulmonetti Parties of Record	Acu
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1		My conclusions are confirmed in Staff Audit Disclosure No. 6, at
2		page 16, and Audit Disclosure No. 15, at page 49. In the Audit, the Staff
3		finds that TSI has been more than adequately compensated for all of the
4		misbilled calls alleged by TSI. Based upon the Staff's analysis, the total
5		volume of these alleged misbillings did not exceed the 2% provided for in the
6		tariff. Thus, no further credits to TSI are warranted.
7		IV. Conclusions
8	Q:	AFTER ACCOUNTING FOR ANY OVERBILLINGS, REFUNDS,
9		SETTLEMENTS, OR OTHER OFFSETS THAT MAY BE
10		APPLICABLE, WHAT AMOUNT, IF ANY, DOES TSI OWE
11		TRANSCALL FOR THE SERVICES IT RECEIVED?
12	A:	Net of all payments, credits, and adjustments, my Exhibit DSM-1 reflects that
13		TSI still owes Transcall \$659,992.88 plus interest from mid-1992. Pursuant
14		to the Commission's rules regarding interest, as of this month, the interest due
15		on this amount would be an additional \$222,045.85.
16	Q:	WHAT IS YOUR RECOMMENDATION TO THE COMMISSION IN
17		THIS CASE?
18	A:	The Commission should accept the Staff Audit report findings that Transcall
19		billed TSI and TSI's customers correctly, or at least well within the 2% error
20		rate specified in the tariffs and Agreement of the parties. Further, the
21		Commission should find that the credits issued by Transcall to TSI exceeded
22		the total amount of TSI's documented credits plus any other billing errors that
23		have been identified. On the basis of this record, the Commission should
24		direct that a total of \$882,038.73 is due from TSI to Transcall. With these

Douglas S. Metcalf Direct Testimony

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Revised -13-

Transsall America, Inc.

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Exhibit No.

bit No. ____ (DBM-1 Revised) Intelens to Staff Audit Earthit 1) Decket No. 951232-11 ndation of Amount Owed by TBI to ATC (Metcalf Cal

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1.11	MONTHLY				PER	STAFF		DEM	NET
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Apr-80	30,709.74	the second secon		(8.665.23)	(10.005.02)	-		-	65,021.6
May-90	23.228.02		0.01	(8,000.00)	the second				69,548.0 75,898.5
Jun-Qu	38,587.00		100.01	(3,198.08)	the second division of				86,903.2
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May-91	84,528.50	64,528.90			(87,321.15)	D			172,067.3
Jun-01	64,167.30		0.01	(22,482.77)		1	1		215,361.8
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Nov-61	81,108.01	01,100.50	(0.02)				1,298.06	62	473,053.4
Dec-01	86,201.84	88,291.98	0.02			-	15,970.58	82	577,286.5
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