

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Audit request related to)	Docket No.	UNDOCKETED
Flow Through of Switched Access)		
Rate Reductions)	Filed:	February 18, 2000
Audit Control No. 99-078-1-3)		

MCI WorldCom's Claim of Confidentiality Pursuant to Section 364.183(1), Florida Statutes

MCI WorldCom, Inc. hereby gives notice that it claims certain documents identified herein to be confidential. Therefor, to the extent that MCI WorldCom claims that the information is confidential, the information is deemed confidential by operation of law (Section 364.183(1), Florida Statutes). MCI WorldCom's claim of confidentiality is based on the highly sensitive data included and the fact that some of the information is customer billing information protected from public disclosure pursuant to Section 364.24, Florida Statutes. Some of this information is highly sensitive and competitively valuable trade secret information. Provisions of FPSC Rule 25-22.006, Florida Administrative Code, to the contrary notwithstanding.

The following documents from Audit Report Control No. 99-078-1-3 are the subject of this request:

PRIEF DESCRIPTION

DATES STAMBED DAGE NITIMBED

BATES STAMPED PAGE NUMBER	DRIEF DESCRIFTION
17-18	Minutes of use Minutes of use, revenue information
20-23	,
35-42	Minutes of use, revenue information, customer account information
46	Minutes of use
48	Revenue information
52	Customer account information
54	Customer account information

AFA APP CAF CMU CTR EAG LEG MAS OPC RRR SEC WAW OTH

DOCUMENT NUMBER - DATE

02246 FEB 188

FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
02244 FEB 188

FPSC-RECORDS/REPORTING

BATES STAMPED PAGE NUMBER	BRIEF DESCRIPTION
58	Customer account information
60	Customer account information
64-66	Minutes of use, revenue-related information,
68-81	Minutes of use, revenue-related information,
	and other highly sensitive competitively
0.0	information.
83-87	Minutes of use, revenue-related information Revenue-related information
89	Minutes of use, revenue-related information
91-100	Revenue-related information, minutes of use
102-107 115	Minutes of use, revenue-related information
118	Competitively sensitive information
110	regarding usage
120	Revenue-related information
122-127	Minutes of use
129	Competitively sensitive usage information,
	revenue related information
131	Competitively sensitive business
	information related to business plans
135-162	Competitively sensitive and valuable
	information related to usage, customer
	account information
164-187	Customer account information
196	Highly sensitive business information Customer account and revenue information
201- 250	Customer account information
252-253 255	Customer account information
259-273	Customer account information, and highly
237-213	proprietary information including
	information related to revenue
289	Information regarding revenue

MCI WorldCom's claim requires that the information be treated as confidential while on file at the Florida Public Service Commission and further that the information be returned as required by Section 364.183, Florida Statutes.

DATED, this 18th of February, 2000.

Donna Canzano McNulty

MCI WorldCom, Inc.

325 John Knox Road, Suite 105

Tallahassee, FL 32303

(850) 422-1254

COMPANY:

MCI WORLDCOM

TITLE:

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DATE:

AUDITOR:

RKY

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DOCUMENT NUMBER-DATE 02246 FEB 188

FPSC-RECORDS/REPORTING

COMPANY:

MCI WORLDCOM

TITLE:

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STANDAND RASS

CONFIDENTIAL



FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF AUDITING AND FINANCIAL ANALYSIS BUREAU OF AUDITING

Miami District Office

MCI WORLDCOM FLOW-THROUGH OF SWITCHED ACCESS RATE REDUCTIONS

> JULY 1, 1998 OCTOBER 1, 1998

AUDIT CONTROL NO. 99-078-1-3

Ruth K. Young, Audit Manager

CONFIDENTAL

Kathy Ł. Welch, Audit Supervisor

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DIVISION OF AUDITING AND FINANCIAL ANALYSIS AUDITOR'S REPORT

JANUARY 31, 2000

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to audit the accompanying Flow-Through Work Sheets dated July 1, 1998 and October 1, 1998 submitted by MCI WorldCom. These Flow-Through Worksheets are in support of the company's reduction to customers because of reduced access charges from the Local Exchange Companies.

Both staff and company imposed scope limitations are detailed in the procedures section.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except to assist the Commission staff in performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

SUMMARY OF SIGNIFICANT PROCEDURES

Our audit was performed by examining, on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below. The following definitions apply when used in this report.

Scanned - The documents or accounts were read quickly looking for obvious errors.

Compiled - The exhibit amounts were reconciled with the general ledger, and accounts were scanned for error or inconsistency.

Reviewed - The exhibit amounts were reconciled with the general ledger. The general ledger account balances were traced to subsidiary ledgers, and selective analytical review procedures were applied.

Examined - The exhibit amounts were reconciled with the general ledger. The general ledger account balances were traced to subsidiary ledgers. Selective analytical review procedures were applied, and account balances were tested to the extent further described.

Confirmed - Evidential matter supporting an account balance, transaction, or other information was obtained directly from an independent third party.

Verify - The item was tested for accuracy and compared to the substantiating documentation.

JULY 1, 1998 FLOW- THROUGH WORK SHEET

Recalculated the Interexchange Carrier Flow-Through Worksheet. Agreed the Local Exchange Company rate changes for access charges to Commission provided documentation.

Calculation of Reduction to the Interexchange Carrier from the Local Exchange Company
The Study Period Intrastate Minutes of Use used to calculate the reduction to the Interexchange
Carrier were traced to company provided printouts from the "Financial Operations Organization"
database. We requested invoices that the Interexchange Carrier received from the Local
Exchange Company to substantiate and compare actual Intrastate Minutes of Use. We limited
our scope in this area because the company said that they do not receive hard copies from the
Local Exchange Company, and it was decided it would be too time consuming to audit the
company's database through the computer. However, as noted below, customer invoices were
audited to see if the rates were actually reduced.

Calculation of reduced Interexchange Carrier tariffs to the Customer.

For two of the residential rate elements and two of the business rate elements, the estimate annual

intrastate Minutes of Use included on the Interexchange Carrier Flow Through Worksheet were traced to company provided documents as follows:

- a. Execunet Residential Service Memos from company personnel.
- b. MCI One Savings Residential Service Memos from company personnel.
- c. Vision Business Service Spreadsheet printout prepared by company personnel.
- d. Vnet Business Service- Spreadsheet printout prepared by company personnel.

The scope was limited because the company could not provide the data to support the minutes of use for each rate element for the information provided to us. However, we received actual Minutes of Use (from the company "HUBCAP" database) for the two residential services mentioned above, and a comparison was prepared of actual to the estimated Minutes of Use. Also, as noted below, customer invoices were audited to see if the rates were actually reduced.

For the four rate elements above, the annual dollar reduction was recalculated and analyzed for reasonableness of methodology.

All tariffs used to calculate the reductions were traced to tariffs filed with the Commission.

Test of Customer Invoices

Selected a judgmental sample of one business and one residential rate element to determine the rates before and after the reductions.

OCTOBER 1, 1998 FLOW-THROUGH WORK SHEET

The same procedures were followed for the October 1, 1998 Flow Through Worksheet as were done for the July 1, 1998 Flow Through Work Sheet.

GENERAL

Tariffs changes made after the October 1, 1998 flow through reduction was implemented were reviewed to determine if there was an increase at a later date.

AUDIT DISCLOSURE 1

SUBJECT:

TARIFF CHANGES

STATEMENT OF FACTS: The company reduced the following rate elements on the Interexchange Carrier Flow Through Work Sheets for July 1, and October 1, 1998.

	July 1, 1998 Reduction	October 1, 1998 Reduction
Residentail		
Execunet Service	Yes	Yes
MCI One Savings	Yes	Yes
Small Business	·	
Preferred	Yes	Yes
Business Market		
Vision	Yes	Yes
Vnet	Yes	Yes
800 Service	Yes	Yes
networkMCI One	No	Yes

An analysis of the tariff changes subsequent to the October 1, 1998 tariffs shows that four of the rate elements were increased on January 28, 1999. They are Vision, Vnet, 800 Service and networkMCI One.

OPINION: A schedule detailing the reductions and increases is on the schedule attached to this disclosure. It appears that a majority of the elements were increased on January 28, 1999 to an amount equal to or higher than in effect before the first access charge reduction flow through. Statute 354.163(6) is silent regarding how long these reductions should be in effect.

MCIWORLDCOM ANALYSIS OF TARIFF CHANGES VISION FEBRUARY 1, 1998 THROUGH JANUARY 1, 1999 NOVEMBER 16, 1999 RKY

PERIOD: DATE: AUDITOR:

OPTION J (MCI VISION)

OPTIONS (NCI VISION)			_				
	Int	erLata]		IntraLata]	
		vitched ccess	Dedicated Access	Vision Card 'Access '	Switched Access	Dedicated Access	Vision Card Access
5TH REVISED SHEET 26.18.1.2 February 1, 1998		0.1881	0.1169	0.2186	0.1453	0.116	0.2186
6TH REVISED SHEET 26.18.12 July 1, 1998		0.1835	0.114	0.2132	0.1421	0.1134	0.2138
Reduction on July 1, 1998		-0.0046	-0.0029	-0.0054	-0.0032	-0.0026	-0.004B
7th REVISED SHEET 26.18.1.2 October 1, 1998		0.1782	0.1107	0.207	0.1421	0.1101	0.2138
Reduction on October 1, 1998		-0.0053	-0.0033	-0.0062		-0.0033	0
8th REVISED SHEET 26.18.1.2 January 28, 1999		0.1887	0.1172	0.2192 ;	0.1505	0.1166	0.2264
Increase on January 28, 1999		0.0105	0.006	0.0122 '	0.0084	0.0065	0.0126

It appears that for this portion of the rate element the January 28, 1999 rate is higher than the rate before the IXC Access reduction.

MCI VISION POWER RATE PROGRAM

3	InterLa	ta			IntraLata			
	In/Out Acces		Out Ded	Power Card	' In/Out Sv			Power Card
22 REVISED SHEET 26.18.0.2 February 1, 1998	0.	1721	0.1042	0.1721	0.12	96	0.1	0.1296
23rd REVISED SHEET 2618.0.2 July 1, 1998	0.	1681	0.1018	0.1681	. 0.1	27	0.098	0.127
Reduction on July 1, 1998	-0	.004	-0.0024	-0.004	-0.00	26	-0.002	-0.0026
24th REVISED SHEET 26.18.0.2 October 1, 1998	0.	1632	0.0988	0.1632	0.1	27	0.0952	0.127
Reduction on October 1, 1998	-0.	0049	-0.003	-0.0049		0	-0.0028	0
25th REVISED SHEET 26.18.0.2 January 28, 1999	0.	1728	0.1046	0.1728	0.13	45	0.1005	0.1345
Increse on January 28 ,1999	0.	0096	0.0058	0.0096	0.00	75	0.0053	0.0075

It appeares that all the elements in this part of the tariff that were reduced for the IXC access charge reduction were increased on January 28, 1999 to an amount higher than the February 1, 1998 tariff.

PERIOD: DATE: AUDITOR:

MCI WORLDCOM ANALYSIS OF TARIFF CHANGES VNET MAY 1, 1998 THROUGH JANUARY 28, 1999 NOVEMBER 17, 1999 RKY

COMPANY: TITLE:

PERIOD:

MCI WORLDCOM ANALYSIS OF TARIFF CHANGES VNET 4 MAY 1, 1998 THROUGH JANUARY 28, 1999 NOVEMBER 17, 1999 RKY

DATE: AUDITOR:

VNET	Interlata	Business Day	Rates	1			
	Sw-Sw & Card			Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded	
	First 18 Sec	Add'l 6 Sec	First 18 Sec	Add1 6 Sec	First 18 Sec	Add'l 6 Sec	
19th Revised Sheet 26.17 May 1, 1998	0.0662	0.0221	0.0451	0.0150	0.0174	0.0058	
20th Revised Sheet 26.17 July 1, 1998	0.0646	3 0.0215	0.0439	0.0146	0.0174	0.0058	
Reduction on July 1, 1998	-0.001	3 -0.0006	-0.0012	-0.0004	0.0000	0.0000	
21st Revised Sheet 26.17 October 1, 1998	0.062	8 0.0209	0.0425	0.0142	0.0174	0.0058	
Reduction on October 1, 1998	-0.002	0 -0.0006	-0.0014	-0.0004	0.0000	0.0000	
22nd Revised Sheet 26.17 January 28, 1999	0.066	3 0.0221	0.0450	0.0150	0.0183	0.0061	
Increase on Jan 28, 1999	0.003	7 0.0012	0.0025	0.0008	0.0009	0.0003	

Out of the six elements, it appears that five were increased January 28, 1999 equal to or higher than the rate in effect to the flow through of the access charge reduction.

	Intralata		Business Day	Rates]			
	Sw-Sw & Card		Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded	
	Fir	st 18 Sec	Add'l 6 Sec	First 18 Sec	Add1 6 Sec	First 18 Sec	Add'l 6 Sec	
19th Revised Sheet 26.17 May 1, 1998		0.0516	0.0172	0.0454	0.0151	0.0174	0.0058	
20th Revised Sheet 26.17 July 1, 1998		0.0505	0.0168	0.0444	0.0148	0.0174	0.0058	
Reduction on July 1, 1998		-0.0011	-0.0004	-0.0010	-0.0003	0.0000	0.0000	
21st Revised Sheet 26.17 October 1, 1998		0.0489	0.0163	0.0431	0.0144	0.0174	0.0058	
Reduction on October 1, 1998	Ī	-0.0016	-0.0005	-0.0013	-0.0004	0.0000	0.0000	
22nd Revised Sheet 28.17 January 28, 1999		0.0519	0.0173	0.0456	0.0152	0.0183	0.0061	
Increase on Jan 28, 1999		0.0030	0.0010	0.0025	0.0008	0.0009	0.0003	

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge reduction flow through.

MCI WORLDCOM ANALYSIS OF TARIFF CHANGES VNET

PERIOD: DATE: AUDITOR:

Increase on Jan 28, 1999

MAY 1, 1998 THROUGH JANUARY 28, 1999 NOVEMBER 17, 1999 RKY

VNET	interlata	Non Busines	s Day Rates			
	Sw-Sw & Card	Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
	First 18 Sec	Add'i 6 Sec	First 18 Sec	Add'i 6 Sec	First 18 Sec	Add'l 6 Sec
19th Revised Sheet 26.17.1 May 1, 1998	0.0582	2 0.0194	0.0353	0.0118	0.0124	0.0041
20th Revised Sheet 26.17.1 July 1, 1998	0.0568	8 0.0189	0.0345	0.0115	0.0123	0.0041
Reduction on July 1, 1998	-0.0014	4 -0.0005	-0.0008	-0.0003	-0.0001	0.0000
21th Revised Sheet 26.17.1 October 1, 1998	0.055	0 0.018	3 0.0335	5 0.0112	2 0.0123	0.0041
Reduction on October 1, 1998	-0.001	8 -0.000	-0.0010	-0.0003	0.0000	0.0000
22nd Revised Sheet 26.17.1 January 28, 1999	0.058	2 0.019	0.0357	7 0.0119	0.0129	0.0043

Out of the six elements, two were increased on Jan 28, 1999 to the same amount as the tariff prior to the two reductions. Four were increased on Jan 28, 1999 resulting in higher tariffs than were in effect prior to the flow through reduction.

0.0011

0.0022

0.0007

0.0006

0.0002

0.0032

	Intralata		Non Business Day Rates				
	Sw-Sw & Card		Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
	Fin	st 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'i 6 Sec
19th Revised Sheet 26.17.1 May 1, 1998	4	0.0470	0.0157	0.0356	0.0119	0.0124	0.0041
20th Revised Sheet 26.17.1 July 1, 1998		0.0461	0.0154	0.0349	0.0116	0.0123	0.0041
Reduction on July 1, 1998		-0.0009	-0.0003	-0.0007	-0.0003	-0.0001	0.0000
21th Revised Sheet 26.17.1 October 1, 1998		0.0448	0.0149	0.0338	0.0113	0.0123	0.0041
Reduction on October 1, 1998		-0.0013	-0.0005	-0.0011	-0.0003	0.0000	0.0000
22nd Revised Sheet 26.17.1 January 28, 1999		0.0474	0.0158	3 0.0360	0.0120	0.0129	0.0043
Increase on Jan 28, 1999		0.0026	0.0009	0.0022	0.0007	0.0006	0.0002

It appears that all rate elements were increased on Jan 28, 1999 to an amount higher than the tariff in effect prior to the flow through of the access charge reduction.

COMPANY:

TITLE:

PERIOD: DATE: AUDITOR:

MCIWORLDCOM ANALYSIS OF TARIFF CHANGES

800 SERVICE

OCTOBER1, 1997 THROUGH JANUARY 28, 1999 NOVEMBER 16, 1999 RKY

Option H (MCI 800 Service)

	Business Day	Business	Night & '	Business	Business	Nicht 9
	vay	Evening	Weekend '	Day	Evening	Night & Weekend
14th Revised Sheet 26.15 October 1, 1997	0.1359	0.1144	0.0832	0.1996	0.1436	0.1022
15th Revised Sheet 26.15 July 1, 1998	0.1328	0.1118	0.0813	0.1936	0.1393	0.0990
Reduction on July 1, 1998	(0.0031)) (0.0026) (0.0019)	(0.0060)	(0.0043	(0.0032)
16th Revised Sheet 26.15 October 1, 1998	0.1228	0.1084	0.0789	0.1896	0.1364	0.0971
Reduction on October 1, 1998	(0.0100	(0.0034) (0.0024)	(0.0040)	(0.0029	(0.0019)
17th Revised Sheet 26.15 January 28, 1999	0.1364	0.1148	0.0836	0.2008	0.1444	0.1028
Increase on January 28, 1999	0.0136	0.0064	0.0047	0.0112	0.0080	0.0057

	business Line Termination				
	Business Day	Business Evening	Night & 'Weekend '		
17th Revised Sheet 26.16 October 1, 1997	0.2254	0.2186	0.2186		
18th Revised Sheet 26.16 July 1, 1998	0.2201	0.2135	0.2135		
Reduction on July 1, 1998	(0.0053) (0.0051	(0.0051)		
19th Revised Sheet 26.16 October 1, 1998	0.2135	0.2071	0.2071		
Reduction on October 1, 1998	(0.0066) (0.0064)	(0.0064)		
20th Revised Sheet 26.16 January 28, 1999	0.2261	0.2193	0.2193		
Increase on January 28, 1999	0.0126	0.0122	0.0122		

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge reduction flow through.

MCIWORLDCOM ANALYSIS OF TARIFF CHANGES NETWORK MCI ONE OCTOBER 1, 1997 THROUGH JANUARY 28, 1999 NOVEMBER 16, 1999 RKY

PERIOD: DATE: AUDITOR:

NETWORKMCI ONE	1					
	Interlata	j		intralata		
	Sw Orig or Terminating	Ded Orig or Terminating	One Card 'Access '	Sw Orig or Terminating	Ded Orig or Terminating	One Card Access
2nd Revised Sheet 26.18.0.22.11 October 1, 1997	0.1357	0.0798	0.1357	0.1077	7 0.0798	0.1077
5th Revised Sheet 25.18.0.22.11 October 1, 1998	0.1340	0.0798	0.1340	0.1064	4 0.0798	0.1064
Reduction on october 1, 1998	(0.0017	7) 0.0000	(0.0017)	(0.0013	3) 0.0000	(0.0013)
6th Revised Sheet 26.18.0.22.11 January 28, 1999	0.1419	9 0.0836	0.1419 	0.1127	7 0.0836	0.1127
Increase on January 28, 1999	0.007	9 0.0038	3 0.0079	0.006	3 0.0038	0.0063

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge reduction flow through.

AUDIT DISCLOSURE 2

SUBJECT: EFFECTIVE DATE OF BILLING FOR REDUCED TARIFFS FOR "VNET BUSINESS SERVICE"

STATEMENT OF FACTS: In PSC Order No 98-0895-FOF-TP, issued June 8, 1998, the Commission stated that the Interexchange Carrier tariffs and supporting documentation for the July 1, 1998 reduction should be filed no later than June 30, 1998, with a July 1, 1998 effective date. Also, the tariffs and supporting documentation for the October, 1998 reduction should be filed no later than September 30, 1998 to be effective October 1, 1998.

In order to determine if the Interexchange Carrier reduced the rates to its customers for the July and October 1998 reductions from the Local Exchange Companies, staff requested a sample of invoices for the months of September 1998 and May 1999. September 1998 was selected to determine if the July 1, 1998 reductions were in place to the customers, and May 1999 was selected to determine if the October 1, 1998 reduction were in place to the customers. The rate element selected for testing was the "Vnet Business Service." Testing of four of these sample items for each month showed the rates billed the customers did not agree with the tariff.

The company explained that "the July 1998 flow through reductions were accepted by the commission during the month of September, thus billing begins with September traffic showing up on the October invoices. The October 1998 reduction were accepted by the commission in November, thus billing begins with November traffic showing up on the December invoices." Therefore, we asked the company to supply us with the October 1998 and December 1998 invoices. The results of the test of these invoices is addressed in Audit Disclosure 5.

Also, at the same time we requested these October 1998 and December 1998 invoices, we asked the company to provide us with the invoices that show the credits the customer received for the months the reduction did not go into effect. The company said it were researching this. To date, we have not received data showing credits.

OPINION: The PSC order stated that the first reduction should go into effect July 1, 1998, and the second on October 1, 1998. The Interexchange Carrier did not reduce billing rates to its customers for the first reduction until September, and did not start billing its customers for the second reduction until November. Therefore, the July 1, 1998 reduction did not flow through to the customer for the months of July and August, and the October 1, 1998 reduction did not flow through for the month of October.

Since we have not received documentation for the credits for the above months, we cannot tell if the customers were given the reductions effective from the dates of the Commission order for this rate element. The other rate element sampled was the residential Execunet Service. It appears that the reductions were in effect at the effective dates.

As stated in Audit Disclosure 1, the "Vnet Business Service" tariff was changed again effective

January 28, 1999 increasing the rates to amounts equal to or higher than the amounts in effect prior to the July 1, 1998 flow through reduction. It appears that the second reduction was only in ffect for billing the months of November and December 98, and January 99. The Interexchange Flow-Through Work Sheets were calculated based on estimated annual data.

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AUDIT DISCLOSURE 3

SUBJECT: ESTIMATED ANNUAL INTRASTATE "EXECUNET SERVICE"

MINUTES OF USE ON FLOW THROUGH WORKSHEETS FOR JULY 98

AND OCTOBER 98

STATEMENT OF FACTS: On the July and October 1998 Interexchange Carrier Flow-Through Work Sheets, the company used a two step calculation to determine the reduction to customers.

The first calculation is the rate change from the Local Exchange Company times an estimated Interexchange Carrier study period Intrastate Minutes of Use. This results in a monthly and then annualized amount to be reduced on the Interexchange Carrier customers bills. The second part of the company's calculation is a detail of the rate elements the company intends to reduce to come up with the results in part one. The annual reduction for each rate element is calculated using the following formula.

"Estimated Annual Intrastate Minutes of Use times the Interexchange Carrier Rate Change = Annual Reduction".

A comparison of the estimated Minutes of Uses on the Flow-Through Work Sheet for "Execunet" Service, with the actual Minutes of Use provided by the company showed the estimated Minutes of Use were higher than the actual.

Execunet Service Inter LATA

July 98
Estimated Annual Intrastate Minutes of Use on Flow-Through
Work Sheet

Actual Annual (12 months ended 6/1/99)
Intrastate Minutes of Use per Company prepared data

Difference

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October 98
Estimated Annual Intrastate Minutes of Use on Flow-Through

Actual Annual (10/98 - 7/99 Annualized)
Intrastate Minutes of Use
per Company prepared data

Difference

Work Sheet



The use of a higher estimated Minutes of Use on the worksheet than the actual amount, resulted in a smaller reduction to the customer.

A schedule was prepared which shows a comparison and the dollar effect of the difference because of the Minutes of Use. The estimated and actual minutes for both "Flow -Through Work Sheets" are on company prepared schedules which follow this disclosure.

The company stated that if you add in the new product "MCI One Advantage" launched July 98, the rate reduction is greater than required by the "Flow-Through Work Sheets" for both months. It states that this new product has the lowest in-state rates and many existing "Execunet" customers migrated to this new tariff. The company's calculation with the "MCI One Advantage Rate" element added in is shown on the attached company schedules.

The "MCI One Advantage Rate" is not used to calculated the annual dollar reduction on either "Flow- Through Work Sheet."

As stated in the scope section of this audit, the company could not provide the data to support the estimated minutes of use used for the calculation of the reduction for "Vision" and "Vnet" Business Services requested. The company stated that flow through process had gone through numerous changes and that the employees who participated in the two flow through processes were no longer with the company. The process used today is different.

OPINION: The attached schedule shows that the estimated Minutes of Use compared with the actual would result in a smaller annual dollar reduction than calculated on the "Flow-Through Work Sheets." The July 1998 amount is thus causing the customers to not get a pass through of these amounts.

The company schedules adding in the "MCI One Advantage Rate" show a higher rate reduction than required on the "Flow- Through Work Sheets." See the schedules attached to this Disclosure. Since the company said that it added the new product (MCI One Advantage Rate) in



July 1998, it would seem that these rates were in effect before the October 1998 flow-through worksheet was submitted and further reductions to other rate elements would have to take place other than the "MCI One Advantage Rate" in order to pass through the access charge reduction.

CONTILLIMAL

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COMPANY:

TITLE: PERIOD:

DATE: **AUDITOR:**

Rate Elements

MCI WORLDCOM

MOU's - Estimated vs. Actual

JULY AND OCT 98 OCTOBER 29, 1999

RKY

JULY 98

Annual Intrastate Minutes of Use

Interexchange

Carrier Annual Rate Change Reduction Reduct Diff

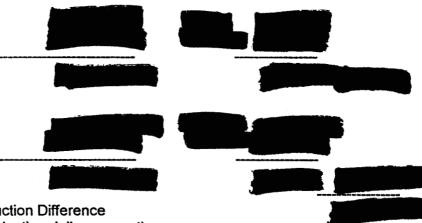
Annual

Execunet Service InterLATA - Estimated

InterLATA-Actual(2)

Difference

Execunet Service IntraLATA - Estimated IntraLATA-Actual(2)



Total Execunet Annual Reduction Difference (Effect of lowering annual reduction dollar amount)

> OCTOBER 98 Annual Intrastate Minutes of Use

Interexchange

Carrier

Annual

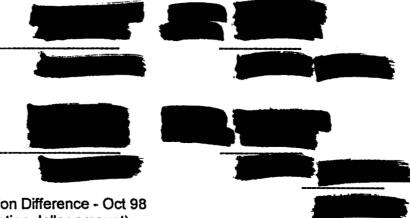
Annual Rate Change Reduction Reduct Diff

Rate Elements

Execunet Service InterLATA - Estimated InterLATA-Annualized (1)

Difference

Execunet Service IntraLATA - Estimated IntraLATA-Annualized(1)



Total Execunet Annual Reduction Difference - Oct 98 (Effect of lowering annual reduction dollar amount)

- (1)'10/98 to 7/99 Annualized
- (2) 12 months end 6/1/99

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IPER FLOW THROUGH WORKSHEET

Intrastate MOU's X IXC Rate Change = Annual Reduction

TOTAL RATE REDUCTION

Rate Element

interLATA intraLATA

interLATA

interLATA intraLATA

Execunet Service interLATA intraLATA

MCI One Savings interLATA

Small Business Preferred interLATA intraLATA

New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings (Minutes From Period 7/98-9/98 Shown Below, 10/98-Present Shown On 10/98 Audit)

interLATA (\$.10 flat) intraLATA (\$.05 flat)



TOTAL RATE REDUCTION

8/24/99 3:57 PM

10/98 FLORIDA FLOW THROUGH AUDIT

PER FLOW THROUGH WORKSHEET COMPANY PREPARED Annual Rate Element Intrastate MOU's X IXC Rate Change = Annual Reduction Consumer **Execunet Service** interLATA intraLATA MCI One Savings interLATA **Small Business** Preferred interLATA TOTAL RATE REDUCTION PER ACTUALS 10/98-7/99 ANNUALIZED PER ACTUALS 10/98-7/99 Consumer Execunet Service **Execunet Service** interLATA interLATA intraLATA intraLATA MCI One Savings MCI One Savings interLATA interLATA **Small Business Small Business** Preferred Preferred interLATA interLATA *** MCI One Advantage *** *** MCI One Advantage *** (New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings) (New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings) interLATA (\$.10 flat) interLATA intraLATA (\$.05 flat) intraLATA TOTAL RATE REDUCTION TOTAL RATE REDUCTION

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AUDIT DISCLOSURE 4

SUBJECT: COMPARISON OF VNET BUSINESS SERVICE REDUCED TARIFFS

STATEMENT OF FACTS: The company reduced its "Vnet" Business Service tariff in both the July 1, 1998 reduction and the October 1, 1998 reduction to the customers. The attached schedules show the per minute rate for the Switched-Switched and the Dedicated-Switched interlata/intralata day and off-peak rates.

The attached analysis shows the amounts billed to the customer at one second increments from .3 seconds to 2 minutes.

The company supplied us with the percentage of calls two minutes or less for the 17 months ended December 1999. The average of these 17 months as calculated by the company is of the calls are two minutes or less.

OPINION: The analysis of one second increments from .3 seconds to 2 minutes shows that because of rounding, the October 1, 1998 reduction for two minutes or less results in the same amount billed to the customer as the July 1, 1998 rates

For these calls, it appears that the customer is not benefitting from the October 1, 1998 reduction.

CONFIDERITION

COMPANY:

TITLE:

MCI WORLDCOM COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 DECEMBER 12, 1999

DATE: AUDITOR:

SWITCHED TO SWITCHED TARIFF FOR VNET

	July 1, 1998	3		Oct 1, 1998	ì
lo. of Minutes	Tariff InterLata/	Amount	No. of Minutes	Tariff InterLata/ Off-Peak*	Amount
0.3	0.1892	0.06	0.3		0.06
0.4		0.08	0.4		0.07
0.5			0.5		0.09
0.6	0.1892	0.11	0.6		0.11
0.7			0.7		0.13
8.0		0.15	0.8		0.15
0.9			0.9		0.17
1	0.1892	0.19	1		0.18
1.1			1.1		0.20
1.2			1.2	0.1834	, 0.22
1.3			i 1.2		∮ 0.24
1.4			1.4		* 0.26
1.5	0.1892		1.5		
1.6	0.1892	0.30	1.6	0.1834	0.29
1.7	0.1892	0.32	1.7	0.1834	0.31
1.8		0.34	1.8	0.1834	0.33
1.9		0.36	1.9	0.1834	
2		0.38	2	0.1834	0.37
lo. Of Minutes	Tariff IntraLata/ Off-peak*	Amount	No. Of Minutes	Tariff IntraLata/ Off-peak*	Amount
	0.4636	0.05		3 0.1493	0.04
0.3 0.4			0.3	D. 1493	0.04
1) 2	1 A 4 E 2 E	. <u>^ ^</u>	^		
			0.4	0.1493	0.06
0.9	5 0.153	80.0	0.9	0.1493 0.1493	0.06 0.07
0.9 0.6	5 0.1535 6 0.1535	0.08 0.09	0.9 0.6	0.1493 0.1493 0.1493	0.08 0.07 0.09
0.8 0.6 0.7	5 0.1535 6 0.1535 7 0.1535	0.08 0.09 0.11	0.9 0.6 0.1	0.1493 0.1493 0.1493 0.1493	0.06 0.07 0.09 0.10
9.0 9.0 7.0 8.0	5 0.1535 5 0.1535 7 0.1535 3 0.1535	0.08 0.09 0.11 0.12	0.: 0.6 0.: 0.8	4 0.1493 5 0.1493 6 0.1493 7 0.1493 8 0.1493	0.08 0.07 0.09 0.10 0.12
9.0 0.6 0.7 9.0 9.0	5 0.1535 7 0.1535 7 0.1535 8 0.1535 9 0.1535	0.08 0.09 0.11 0.12 0.14	0.: 0.6 0.: 0.6 0.:	4 0.1493 5 0.1493 6 0.1493 7 0.1493 8 0.1493 9 0.1493	0.06 0.07 0.09 0.10 0.12 0.13
0.9 0.6 0.7 0.8 0.9	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1535 1 0.1535	0.08 0.09 0.11 0.12 0.14 0.15	0.: 0.6 0.: 0.:	4 0.1493 5 0.1493 6 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15
0.9 0.6 0.7 0.8 0.9 1	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1531 1 0.1535 1 0.1535	0.08 0.09 0.11 0.12 0.14 0.15	0.: 0.6 0.: 0.: 0.:	4 0.1493 5 0.1493 6 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16
0.9 0.6 0.7 0.8 0.9 1 1.7	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1535 1 0.1535 1 0.1535 2 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17	0.5 0.6 0.7 0.8 0.9 1.7 1.7	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16
0.9 0.6 0.7 0.8 0.9 1.1 1.2	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1535 1 0.1535 1 0.1535 2 0.1535 3 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18	0.5 0.6 0.7 0.8 0.9 1.7 1.3	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18
0.8 0.6 0.7 0.8 0.9 1.1 1.2 1.3	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1535 1 0.1535 1 0.1535 2 0.1535 4 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.7	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19
0.8 0.6 0.7 0.8 0.9 1.1 1.2 1.3	5 0.1535 6 0.1535 7 0.1535 8 0.1535 9 0.1535 1 0.1535 2 0.1535 3 0.1535 4 0.1535 5 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20 0.21	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.7	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493 5 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19 0.21
0.9 0.6 0.7 0.8 0.9 1.7 1.2 1.3 1.4 1.4	5 0.1535 6 0.1535 7 0.1535 9 0.1535 9 0.1535 1 0.1535 2 0.1535 3 0.1535 4 0.1535 5 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20 0.21 0.23	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.7 1.8	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493 5 0.1493 8 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19 0.21
0.9 0.6 0.7 0.8 0.9 1.7 1.2 1.4 1.9 1.9	5 0.1535 6 0.1535 7 0.1535 9 0.1535 9 0.1535 1 0.1535 2 0.1535 3 0.1535 4 0.1535 5 0.1535 7 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20 0.21 0.23 0.25 0.26	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.7 1.7 1.8 1.8	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493 5 0.1493 6 0.1493 7 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19 0.21 0.22
0.9 0.6 0.7 0.8 0.9 1.7 1.2 1.3 1.4 1.9 1.1 1.1	5 0.1535 6 0.1535 7 0.1535 9 0.1535 9 0.1535 1 0.1535 2 0.1535 3 0.1535 4 0.1535 6 0.1535 7 0.1538	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20 0.21 0.23 0.25 0.28	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.9 1.9 1.9 1.9 1.9	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493 5 0.1493 6 0.1493 8 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19 0.21 0.22 0.24 0.25
0.9 0.6 0.7 0.8 0.9 1.7 1.2 1.3 1.4 1.1 1.5 1.1	5 0.1535 6 0.1535 7 0.1535 9 0.1535 9 0.1535 1 0.1535 2 0.1535 3 0.1535 4 0.1535 5 0.1535 6 0.1535 8 0.1535	0.08 0.09 0.11 0.12 0.14 0.15 0.17 0.18 0.20 0.21 0.23 0.25 0.25 0.28 0.28	0.9 0.6 0.7 0.8 0.9 1.7 1.7 1.9 1.9 1.9 1.9 1.9 1.9 1.9 1.9 1.9 1.9	4 0.1493 5 0.1493 7 0.1493 8 0.1493 9 0.1493 1 0.1493 1 0.1493 2 0.1493 3 0.1493 5 0.1493 6 0.1493 8 0.1493	0.06 0.07 0.09 0.10 0.12 0.13 0.15 0.16 0.18 0.19 0.21 0.22 0.24 0.25 0.27

^{*} Blended tariff rate calculated by the company based on the tariff filed with the Commission

MCI WORLDCOM COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

PERIOD:

SERVICE.
JULY 1, 1998 AND OCTOBER 1, 1998
DECEMBER 12, 1999

DATE: AUDITOR:

RKY

SWITCHED TO SWITCHED TARIFF FOR VNET NCLUDES CALLING CARDS

	July 1, 1998	3		Oct 1, 1998	i	
No. of Minutes	Tariff InterLata/ Day*	Amount	No. of Minutes	Tariff InterLata/ Day*	Amount	Difference
0.3	0.2154	0.06	0.3	0.2086	0.06	0.00
0.4			0.4	0.2086	0.08	0.00
0.5			0.5		0.10	0.00
0.6			0.6		0.13	0.00
0.7			0.7		0.15	0.00
0.8			0.8		0.17	0.00
0.9			0.9		0.19	0.00
1			1		0.21	(0.01
1.1			1.1			(0.01
1.2			1.2		0.25	(0.01
1.3			1.3			(0.01
1.4			1.4		0.29	(0.01
1.5			1.5			(0.01
1.6			1.6			(0.01
1.3			1.7			(0.01
1.8			1.8			(0.01
1.9			1.9			(0.01
	0.2154		2			(0.01
	Tariff			Tariff		
	IntraLata/			IntraLata/		
No. of Minutes	Day*	Amount	No. of Minutes	Day*	Amount	
0.	3 0.1683	3 0.05	0.3	0.1631	0.05	0.00
0.4			0.4			0.00
0.			0.5			0.00
0.0			0.6			0.00
0.			0.7			0.00
0.			0.8			0.00
0.			0.9			0.00
	1 0.1683		1			(0.01
1.			1.1			(0.0
1.			1,2			0.00
1.			1.3			(0.0)
			1.4			(0.0)
1.			1.5			(0.0)
1. 1.	5 0.1683	u.25				,
				0.1631	0.26	(0.0
1.	6 0.1683	3 0.27	1.6			
1. 1.	6 0.1683 7 0.1683	3 0.27 3 0.29		7 0.1631	0.28	(0.0)
1. 1. 1.	6 0.1683 7 0.1683 8 0.1683	3 0.27 3 0.29 3 0.30	. 1.6 1.7	7 0.1631 3 0.1631	0.28 0.29	(0.0° (0.0° (0.0°

^{*} Blended tariff rate calculated by the company based on the tariff filed with the Commission.

COMPANY:

TITLE:

MCI WORLDCOM
COMPARISON OF JULY 1, 1998 REDUCTION TO
OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS
SERVICE.
JULY 1, 1998 AND OCTOBER 1, 1998
DECEMBER 12, 1999

PERIOD:

DATE:

AUDITOR:

RKY

SWITCHED - DEDIC ATED TARIFF FOR VNET

	July 1, 1996 Tariff InterLata/	9		Oct 1, 1998 Tariff InterLata/	1	
No. of Minutes	Day*	Amount	No. of Minutes	Day*	Amount	Difference
0.3	0.1463	0.04	0.3	0.1417	0.04	0.00
0.4	0.1463	0.06	0.4	0.1417	0.06	0.00
0.5	0.1463	0.07	0.5	0.1417	0.07	0.00
0.6	0.1463	0.09	0.6	0.1417	0.09	0.00
0.7	0.1463	0.10	0.7	0.1417	0.10	0.00
8.0			0.8	0.1417	0.11	(0.01)
0.9	0.1463	0.13	0.9	0.1417	0.13	0.00
1	0.1463	0.15	1	0.1417		(0.01)
1.1	0.1463	0.16	1.1	0.1417	0.16	0.00
1.2	0.1463	0.18	1.2	0.1417	0.17	(0.01)
1.3	0.1463	0.19	1.3	0.1417	0.18	(0.01)
1.4	0.1463	0.20	1.4	0.1417	0.20	`0.00
1.5	0.1463	0.22	1.5	0.1417	0.21	(0.01)
1.6		0.23	1.6	0.1417		0.00
1.7		0.25	1.7	0.1417	0.24	(0.01)
1.8	0.1463	0.26	1.8	0.1417	0.26	`0.00
1.9		0.28	1.9	0.1417	0.27	(0.01)
2	2 0.1463	0.29	2	0.1417	0.28	(0.01)
		SWITCHED - DEC	IC ATED TABLES FOR V	NET	1	

SWITCHED - DEDIC ATED TARIFF FOR VNET

	July 1, 1996 Tariff IntraLata/	8 .		Oct 1, 1998 Tariff IntraLata/	В	
No. of Minutes		Amount	No. of Minutes	Day*	Amount	
0.3			0.3	0.1436	0.04	0.00
0.4		0.06	0.4	0.1436	0.06	0.00
0.5		0.07	0.5	0.1436	0.07	0.00
0.6	0.1479	0.09	0.6	0.1436		0.00
0.7	0.1479	0.10	0.7	0.1436		0.00
0.8	0.1479	0.12	0.8	0.1436		(0.01)
0.9	0.1479	0.13	0.9			0.00
1	0.1479	0.15	1	0.1436		(0.01)
1.1	0.1479	0.16	1.1	0.1436		0.00
1.2	0.1479	0.18	1.2			(0.01)
1.3	0.1479	0.19	1.3			0.00
1.4	0.1479	0.21	1.4			(0.01)
1.5		0.22	1.5			0.00
1.6	0.1479	0.24	1.6			(0.01)
1.7	0.1479	0.25	1.7			(0.01)
1.8	0.1479	0.27	1.8			(0.01)
1.9		0.28	1.9			(0.01)
2		0.30	2			(0.01)

^{*}Blended tariff rate calculated by the company based on the tariff filed with the Commission.

COMPANY:

TITLE:

MCI WORLDCOM COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

PERIOD:

SERVICE.
JULY 1, 1998 AND OCTOBER 1, 1998
DECEMBER 12, 1999

DATE: AUDITOR:

RKY

SWITCHED - DEDIC ATED TARIFF FOR VNET

	Oct 1, 1998		1	July 1, 1998	
nount	Tariff InterLata/ Off-Peak*	No. of Minutes	Amount	Tariff InterLata/ Off-Peak*	No. of Minutes
0.03 0.00	0.1116	0.3	0.03	0.1150	0.3
0.04 (0.0	0.1116	0.4	0.05	0.1150	0.4
0.06 0.00	0.1116	0.5	0.06	0.1150	0.5
0.07 0.00	0.1116	0.6	0.07	0.1150	0.6
0.08 0.00	0.1116	0.7	0.08	0.1150	0.7
0.09 0.00	0.1116	8.0	0.09	0.1150	0.8
0.10 0.00	0.1116	0.9	0.10	0.1150	0.9
0.11 (0.0	0.1116	1	0.12	0.1150	1
0.12 (0.0	0.1116	1.1	0.13	0.1150	1.1
0.13 (0.0	0.1116	1.2	0.14	0.1150	1.2
0.15 0.00	0.1116	1.3	0.15	0.1150	1.3
0.16 0.00	0.1116	1.4	0.16	0.1150	1.4
0.17 0.00	0.1116	1.5	0.17	0.1150	1.5
0.18 0.00	0.1116	1.6	0.18	0.1150	1.6
0.19 (0.0	0.1116	1.7	0.20		1.7
0.20 (0.0	0.1116	1.8	0.21	0.1150	1.8
0.21 (0.0	0.1116	1.9	0.22	0.1150	1.9
0.22 (0.0	0.1116	2			2

SWITCHED - DEDIC ATED TARIFF FOR VNET

No. Of Minutes	Tariff IntraLata/ Off-peak*	Amount	No. Of Minutes	Tariff IntraLata/ Off-peak*	Amount	
0.3	0.1163	0.03	0.3	0.1126	0.03	0.00
0.4	0.1163	0.05	0.4	0.1126		0.00
0.5	0.1163	0.06	0.5	0.1126		0.00
0.6	0.1163	0.07	0.6	0.1126		0.00
0.7	0.1163	0.08	0.7	0.1126		0.00
0.8	0.1163	0.09	0.8	0.1126		0.00
0.9	0.1163	0.10	0.9	0.1126		0.00
1	0.1163	0.12	1	0.1126		(0.01)
1.1	0.1163	0.13	1.1	0.1126		(0.01)
1.2	0.1163	0.14	1.2	0.1126		0.00
1.3	0.1163	0.15	1.3	0.1126	0.15	0.00
1.4		0.16	1.4	0.1126		0.00
1.5			1.5	0.1126	0.17	0.00
1.6			1.6	0.1126	0.18	(0.01)
1.7			1.7	0.1126	0.19	(0.01)
1.8			1.8	0.1126	0.20	(0.01)
1.9			1.9	0.1126	0.21	(0.01)
2	0.1163	0.23	2	0.1126	0.23	0.00

^{*}Blended tariff rate calculated by the company based on the tariff filed with the Commission.

AUDIT DISCLOSURE 5

SUBJECT: VNET BUSINESS SERVICE SAMPLE

STATEMENT OF FACTS: A judgmental sample of 42 "Vnet" Business Service invoices were selected and recalculated to determine if the company was following its tariff reductions.

Eight invoices did not compute when calculating the minutes times the tariff.

The company stated that these eight invoices were Special Contract Arrangement "Vnet" accounts. Company personnel stated that there were special discounts that were included in the rate prior to the billing and would not compute. A letter from the company, which follows, states that its authority was Florida Rule 25-24.485(I)(a). The company interpretation of this rule is that this allows "...interexchange carriers to offer contract services without having to disclose the usage rates in the tariff."

Even though these accounts were included in the population we requested for the "Vnet" sample, the company stated that the estimated minutes of use for these accounts were not included when calculating the Vnet reduction on the Interexchange Flow Through Worksheet.



December 29, 1999

Law & Public Policy
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Ruth Young
Miami District Office
Florida Public Service Commission
3625 NW 82 Avenue, Suite 400
Miami, FL 33166-7602

RE: Vnet Response

Dear Ms. Young:

Per our phone conversation following please find two tariff sheets referencing Special Customer Arrangements and Special Service Arrangements. You will note that Sheet 28.1.0.2 indicates that the rates and terms and conditions for these special contracts will be tariffed. However, several years ago the commission revised this requirement allowing interexchange carriers to offer contract services without having to disclose the usage rates in the tariff. I have included a copy of the FL rules referencing this matter [Rule 25-24.485(1)(a)].

Should you require additional information, please feel free to contact me at 800-759-3813.

L. Davis

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12/29/99 WED 17:14 FAX 770 284 5533

MCI WORLDCOM REG AFFAIRS

Ø 003

MCI TELECOMMUNICATIONS CORPORATION

F.P.S.C. TARIFF NO. 2 1ST REVISED SHEET 18 CANCELS ORIGINAL SHEET 18

SECTION 2 - RULES AND REGULATIONS

2.16 SPECIAL CUSTOMER ARRANGEMENTS

2.16.1 In cases where a customer requests special arrangements which may include engineering, installation, construction, facilities, assembly, purchase or lease of facilities, and/or other special services not offered under this tariff, HCI, at its option, will provide the requested services. Appropriate recurring and/or non-recurring charges will be developed accordingly.

ISSUED: January 30, 1990

EFFECTIVE: MAR 0 1 1990

by:

Liz Whitley
Manager, Rates and Tariffs
400 Perimeter Center
Atlanta, Georgia 30345

MCI WORLDCOM REG AFFAIRS

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MCI TELECOMMUNICATIONS CORPORATION

P.P.S.C. TARIFF NO. 2 1ST REVISED SHEET 28.1.0.2 CANCELS ORIGINAL SHEET 28.1.0.2

SECTION 4 - RATES

4.5 SPECIAL SERVICE ARRANGEMENTS

Upon appropriate circumstances, the Company may enter into Special Service Arrangements furnished in lieu of existing tariff offerings. All rates and charges for specific service(s) provided will be negotiated on an individual case basis. In such circumstances, the rates, terms and conditions applicable to such special contractual offerings will be specified below, with cross-reference to the particular contract involved.

4.5.1 <u>University of Plorida</u>

- A. This tariff offering is a Special Service Arrangement (SSA) for Vnet Service and University Calling Card Service being provided to the University of Florida in response to the Request for Proposal No. 93P93.
- B. The Vnet Service being provided under this Special Service Arrangement is described in Section 3.5.9 of this tariff.
- C. The University Calling Card Service is a customized Calling Card Service which is offered to the University of Florida pursuant to the terms and conditions contained in the MCI Response. The service is a one-way, dial-in-dial-out multipoint service. Subscribers can originate calls from any tone-dial phone via an "800" number.

Regulations

The General Conditions, Specifications and Special Requirements of the Request for Proposal No. 93P93 shall be considered as part of this Special Service Arrangement.

Rates and Charges

Vnet Service

BUSINESS DAY

EVENING

HIGHT/WEBKEND

\$.1080

\$.0756

\$.0756

B. University Calling Card Service

BUSINESS DAY

EVENING

MIGHT/WEEKEND

\$.1583

\$.1413

\$.1413

CERTAIN HATERIAL LOCATED ON THIS SHEET WAS PREVIOUSLY FOUND ON SHEET 28.1.0.4.

ISSUED: June 28, 1996

EFFECTIVE: July 1, 1996

på:

Julie L. Davis
Manager, Rates and Tariffs
780 Johnson Ferry Road
Suite 700
Atlanta, Georgis 30342

Supp. No. 185	TELEPHONE COM	PANTES CHAPTE	R 25-24
25-4.077	Metering and Recording Equipment	All	
25-4.160	Operation of Telecommunications Relay Service	Subsection (1)	,
the local exchange	mpany may act as an agent of t	the customer in obtaining servi exchange company bills the cu	
Specific Authori Law Implemented 364.19, 364.30,	ty: 350.127(2), F.S. : 364.01(4), 364.07, 364.17 364.337, 364.3375, 364.345,	, 364.14, 364.15, 364.16, 364.386, 427.704, F.S.	

25-24.480 Records & Reports; Rules Incorporated.

(1) The following rules are incorporated herein by reference and apply to interexchange companies. In these rules, the word "local" should be omitted or interpreted as "toll", as they shall apply only to interexchange and not local service.

History--New 2/23/87, Amended 6/24/80, 9/16/92, 2/3/93, 3/13/96, 02/01/99.

SECTION	TITLE	PORTIONS NOTAPPLICABLE
25-4.019	Records and Reports in General	None
25-4.020	Location and Preservation of Records	Subsections (1), (3)
25-4.023	Report of Interruptions	Subsection (1)
25-4.043	Inquiries	None
25-4.0161	Regulatory Assessment Fees	None
25-4.079	Hearing/Speech Impaired Persons	Subsections (1), (2), (3), and (5)
25-4.115	Directory Assistance	Subsections (1), (2)

- Each company shall file updated information for the following items with the Division of Telecommunications and the Division of Records and Reporting within 10 days after such changes occur.
- (a) The address of the certificate holder's main corporate and Florida offices (if any) including street name and address and post office box, city, state and zip code.
- (b) Telephone number, name, and address of the individual who is to serve as primary liaison with the Commission in regards to the ongoing Florida operations of the certificated company.

Specific Authority 350.127(2) FS.
Law Implemented 350.113, 350.115, 350.117, 364.17, 364.18, 364.185, 364.337 FS.
History--New 2-23-87, Amended 4-5-88, 7-11-88, 6-3-90, 10-25-90, 11-20-91, 12-29-91, 12-22-92, 12-27-94, 3-13-96, 10-1-96.

25-24.485 Tariffs.

All tariffs must be filed with the Commission, using the following guidelines, before becoming effective.

General. (1)

Each company shall maintain on file with the Commission tariffs which (a) set forth all of the rates and charges for customer services, the different services available to subscribers and the conditions and circumstances under which service will be furnished. Interexchange carriers are authorized to provide services to other certificated telephone companies by individually negotiated contract rates in addition to filing and providing those services to end users pursuant to tariffs. When an interexchange carrier chooses to utilize such

Supp. No. 185

TELEPEONE COMPANIES

CHAPTER 25-24

individually negotiated contract rates for services to other certificated telephone companies, and in any other instances in which the Commission has authorized contract rates for specific offerings, the conditions under which such contracts may be offered shall be clearly stated in the company's tariff but the contracts themselves need not be part of the tariff. The contracts must, however, be available for Commission review. The tariff shall not include charges for customer premises equipment.

- Each company shall provide support to accompany any proposed changes (b)
- as outlined in subsection (4).

 (c) The tariff will be Florida-specific and all rates, charges, and service descriptions shall be for intrastate usage, unless interstate rates are necessary to compute the intrastate portion of a customer's monthly bill; then, the interstate rates, charges, and service descriptions shall also be quoted in the tariff to the extent necessary to compute the intrastate portion of a customer's bill.
- (d) The tariff must be clearly expressed in simple words, sentences and paragraphs. It must avoid unnecessarily long, complicated or obscure phrases or acronyms so that the customer will understand that for which he is contracting.

 (e) The tariff shall be written in a manner such that service will be provided on a non-discriminatory basis. No public statement of service quality, rates, or service offerings or billings should be misleading or differ from those stated in the tariff.
- (f) A printed notice shall be kept posted by each company in a public and conspicuous place in each office where application for service may be made stating that its tariff and standard contract and agreement forms are on file at that office and are open to examination by any person. The company will also make available a list of the exchanges it serves.
- All proposed changes to the existing tariff shall be directed to the (g) Director of the Division of Telecommunications, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0866. A filing must be received by the Division of Telecommunications before 5:00 p.m. of a normal Commission
- by the Division of Telecommunications perces 5:00 p.m. or a normal commission workday in order for it to be "filed" on that day.

 (h) All tariff changes shall be submitted to the Commission in quadruplicate in the form prescribed herein. After the effective date, one copy stamped "recaived" will be returned to the company, which shall be the notice to the company that the filing has been received and is on file. If acknowledgement of the filing at the time of receipt is desired, the letter of transmittal shall be considered. be sent in duplicate with a request that the duplicate be returned.
- Companies shall charge only the rates contained in their tariff. (i) a company desires to charge rates or charges at a lower level than is contained in an existing tariff and wishes to charge those lower rates only temporarily and afterwards return to the existing tariff level, it may, instead of filing two tariff revisions to decrease and then later increase the rate, file a single tariff change reflecting the conditions of the temporary tariff change. Such tariff provision shall include the heading "Promotion," and shall state the specific tariff charges to be reduced, the temporary level of charges, a description of the customers who would be eligible for the decrease, the conditions under which customers would receive a decrease, and the beginning and ending dates of the reduction. The tariff page(s) describing the terms and rates of the temporary reduction shall immediately precede the permanent tariff pages for the service in
- the same section of the tariff.

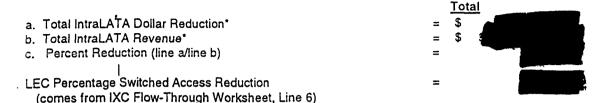
 (j) The requirements of the following subsections shall apply on a prospective basis from the effective date of this rule. Existing tariffs on the effective date of this rule need not be amended to comply with the following except upon Commission staff request.
 - (2) Effective Date.

III. EXHIBITS

	Name of IXC:	MCI Telecommunications		FL 7-98	CON	FIDENTIAL
	LEC	Rate Change	X	Study Period # Intrastate Minutes (MOUS)	Monthly SW Access Savings	Annual SW Access Savings
	GTE Orig CCL Term CCL	\$0.0022555 \$0.0034969				\$
3.	Sprint	\$ 0.00295	Х			\$
4.	Total Switched Access Savings	(Sum lines 1-3)				
5.	Statewide intrastate long distan	ce study period billable revenu	ıe		\$	
6.	Required % reduction in IXC's F	L intrastate long distance rate	s (lin	e 4/line 5)		
	Rate Element	Annual Intrastate MOUs	X	IXC Rate Change	Annual Reduction	
	Consumer Execunet Service interLATA intraLATA MCI One Savings interLATA Small Business Preferred interlata		x x			
	interLATA intraLATA		x			
000005	Business Markets Vision interLATA intraLATA Vnet interLATA intraLATA 800 Service interLATA intraLATA Total		×	Page 1		

Percentage Reduction of IntraLATA Toll Rates

CONFIDENTIAL



NOTE: Line 1c must be no greater than Line 2.

Determination of Residence & Business Calculation

Mass Markets - Residential & Small Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Business Markets - Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Each business units' (i.e., Residential, Small Business, and Business Markets) portion of the total reduction is calculated on a pro rata basis using the percentage of revenues for each business unit for the study period.

5 5 5	Business Markets Small Business Residential	\$ \$ \$		
5	Total Study Period			100.00%
ה ה	Revenues	\$		100.00%
	IXC Flow Through S	ummary		
. Annualized Effect* of Flow Through to Res	sidential Rates		=	\$
. Annualized Effect* of Flow Through to Bus	iness Rates		=	\$
. Total Annualized Flow Through* (line 1 + l			=	\$

^{*}see IXC Flow Through Worksheet

000027

Name of IXC: Study Period:

MCI Telecommunications
June, 1998

FL 10-98

LEC	Rate Change X	Study Period # Intrastate Minutes (MOUS)	Monthly SW Access Savings	Annual SW Access Savings
Orig CCL Term CCL				\$
3. Sprint	\$ X			s
Total Switched Access Savings (Su				\$
5. Statewide intrastate long distance s			\$	
6. Required % reduction in IXC's FL in	trastate long distance rates (line	e 4/line 5)		•
Rate Element	Annual Intrastate MOUs X	IXC Rate Change	Annual Reduction	
Consumer Execunet Service interLATA intraLATA	X X			
MCI One Savings interLATA	×			
Small Business Preferred interLATA				
Business Markets Vision interLATA	x	=		
intraLATA Vnet interLATA intraLATA	×			
800 Service interLATA intraLATA networkMCI One	x			
interLATA intraLATA Total	x	Page 1		

Percentage Reduction of IntraLATA Toll Rates

CONFIDENTIAL

a. Total IntraLATA Dollar Reduction*

- b. Total IntraLATA Revenue*
- c. Percent Reduction (line a/line b)
- 2. LEC Percentage Switched Access Reduction (comes from IXC Flow-Through Worksheet, Line 6)

Total

NOTE: Line 1c must be no greater than Line 2.

Determination of Residence & Business Calculation

Mass Markets - Residential & Small Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction.

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Business Markets - Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Business Markets

Each business units' (i.e., Residential, Small Business, and Business Markets) portion of the total reduction is calculated on a pro rata basis using the percentage of revenues for each business unit for the study period.

	Small Business	\$		
C	Residential	\$		
S	Total Study Period			
ဝိ	Revenues	\$ 1		100.00%
()				
8	IXC Flow Through	Summary		
1. Annualized Effect* of Flow Thro	ugh to Residential Rates		=	\$
2. Annualized Effect* of Flow Thro			=	\$
3. Total Annualized Flow Through			=	\$

^{*}see IXC Flow Through Worksheet



December 17, 1999

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Letter of December 10, 1999 concerning IXC Flow Through Worksheet Audits of MCI WorldCom and WorldCom Technologies

Dear Ms. Young:

Per the above mentioned letter the following responses are being provided.

MCI WorldCom

1. Answer to request No. 13.

Note A - Account

The calls in question on April 3, 17, and 24 were listed on the customer's invoice as being 3 minutes in duration and billed at \$.75. Your notes indicate these calls are intraLATA and should have been billed at \$.12 per minute resulting in a charge of \$.36. Our research indicates that all three calls are interLATA and were therefore billed correctly at \$.75 each. The April 3 and April 24 calls originated from NPA-NXX 904-503 [LATA 456] and terminated at 904-705 [LATA 452] (see Exhibit A). The April 17 call originated from 904-503 [LATA 456] and terminated at 904-277 [LATA 452] (see Exhibit B).

Notes B and C - Account

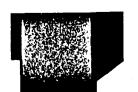


The calls in question are:

April 19, 1998 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; May 10, 1999 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; and May 14, 1999 a 3 minute call from 352-978 [LATA 454] to 352-307 [LATA 454]. According to the customer's invoice these are interLATA calls. As you can see in Exhibit C, my initial research agrees with your note indicating these are intraLATA calls. However, also included in Exhibit C is an email containing a print screen from OCIS [On-line Customer Information Service]. This screen indicates







Letter to Ms. Young December 17, 1999 Page 2

that this ANI is cellular. Cellular service is not regulated and cellular rates are not required to be tariffed.

Note D and E - Account

The calls in question are a 21 minute call which originated at 6:58 p.m. on March 12, 1998 and billed \$3.54 and a 12 minute call which originated at 6:55 pm on April 26, 1999 and billed \$2.16. These calls are designated as "Day" [i.e., Peak] calls on the invoice. This designation is determined from the origination time of the call. However, the day period ends at 7:00 pm. In cases such as this when a call crosses time of day boundaries, the call is rated by designating the appropriate per minute rate to those minutes falling into the peak and off-peak categories respectively. To illustrate I have outlined the calculations for the two calls in question below.

March 12, 1998 call

$$6:58 - 6:59 = 2$$
 minutes x $$.25 = $.50$
 $7:00 - 7:18 = 19$ minutes x $$.16 = 3.04
Total call = 21 minutes = $$3.54$

April 26, 1999 call

$$6:55 - 6:59 = 5$$
 minutes x $$.25 = 1.25
 $7:00 - 7:06 = 7$ minutes x $$.13 = 0.91
Total call = 12 minutes = $$2.16$

In addition, Exhibit D indicates that these calls were properly charged the interLATA usage rates.

Answer to Request No. 14

3

1. Account No.

I have relayed this information to our billing audit group and should have a response by December 23, 1999.



5-3p2 000040



Letter to Ms. Young December 17, 1999

card charges, I have relayed this information to our billing audit group and should have a response by December 23, 1999.

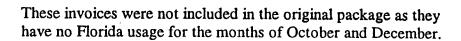
9. Account



10/98 - invoice included as Exhibit G

12/98 - I have relayed this information to our billing audit group and should have a response by December 23, 1999.

10. Account



WorldCom Technologies

1. Request No. 11

The World One invoices are being shipped via overnight mail from Chris Pace in Clinton, MS. You should receive these on 12/20/99.

2. Requests 10 and 12

This information will be provided the week of 12/20/99. I would like to arrange a conference call with our internal subject matter experts to go over this information and answer any questions you may have. Please contact me with your schedule.

3. Classic

See Exhibit H

The information in Exhibits E through H contains some confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom appreciates your handling this matter as confidential.

Please feel free to contact me with any questions or concerns regarding this information.

Sincerely,

lig L. Davis

Regulatory Manager

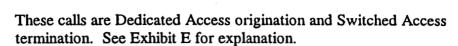
CONFIDENTIAL

5-393



Letter to Ms. Young December 17, 1999 Page 2

2. Account



3. Account

I have relayed this information to our billing audit group and should have a response by December 23, 1999.

4. Account

The \$.40 charge is a surcharge that applies to all Vnet card calls. This is tariffed in section 4.1.9.2.1 of the Florida tariff. This section is a subset of section 4.1.9.2 Rates and Charges and is not subject to time of day.

5. Account

I have relayed this information to our billing audit group and should have a response by December 23, 1999.

6. Account

10/98 – I have relayed this information to our billing audit group and should have a response by December 23, 1999.

12/98 - See Exhibit F. These calls are identified as cellular calls on the invoice. Cellular service is not a regulated service and therefore per minute rates are not required to be tariffed.

7. Account

Same as No. 2 above.

8. Account

The Dial One access portion of these bills is accurate. The \$.40 is applicable as described in No. 4 above. For the calculation of the

5-3pH 000042

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43						 	-				-	-	 	=	 		=	-						

DECLIEST NO	<i>.</i> ₹	
REQUEST NO.		

RE: ANNUAL INTRASTATE MOUS FOR 7-98 AND 10-98

- A. For Execunet service, how did you determine the annual MOU amounts on the IXC flow through worksheets? Provide documentation in addition to the memo previously provided. For example, from what accounting system were these MOUs obtained, provide copies of reports backing up the totals.
- B. The documentation provided for Business Markets for VNET in total does not agree with staff calculation. See attached Schedule A for 7-98 and B for 10-98. Please explain the differences.
- C. For VNet, please explain how you came up with the annual minutes on the documentation provided. Provide explanation of how you determined the annual minutes and documentation from the company's records.
- D. For Vision, please provide the % used for inter and intra lata so that we may determine the total minutes of use from the back up provided, as we discussed before.
- E. Also, for Vision, explain how you came up with the annual minutes on the documentation provided. Provide explanation of how you determined the annual minutes and documentation from the company's records.

16-36° CONTENTIAL C00044

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

REQUEST NUMBER: AUDIT PURPOSE: REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: ITEM DESCRIPTION: CAUDITOR PREPARING PROPERING PR	QUIRY
Re: Data provided in 9/29/99 litter attachment A s Staff prepared the attached schedule comparing the hubban a deturbent the flow thru I worksheet for responsible of MCI one Janing of to responsible of the assurb minutes on the a There are large differences for Executed For beth diter + ontre later - Please	Interest
TD: AUDIT MANAGER RUTO JOUNG THE REQUESTED RECORD OR DOCUMENTATION: (1) AND HAS BEEN PROVIDED TODAY	
C2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY (3) AND IN MY OPINION. ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS IMPORMATION AS DE 364 183, 366 083. OR 367 156. F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDING OF THIS MATERIAL, THE UTILITY OR OTHER MIST. MITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE. FILE A RECUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIRECTOR AND REPORTING. REFER TO RULE 25-22.006. F.A.C. (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM) DISTRIBUTION: White: Utility Complete and Return to Auditor Prink: Audit File Copy Canary: Utility Retain	RK HEROOM

NCI WORLDCOM REG AFFAIRS
FPSC MIAMI

PAGE UJ 007

10/29/1999 09:28

3054705F

COMPANY:

MCI WORLDCOM

DOCUMENTATION FOR ANNUAL INTRASTATE

MOU'S USED ON THE FLOW THRU WORK SHEET

theorest 10

PERIOD:

JULY 98 andOCT 98

DATE: AUDITOR: OCTOBER 27, 1999

RKY

WP NO.

45-1/3-1

in answer to our request to determine how the company arrived at the annual MOU used in the flow thru work sheet, the company stated that for the July worksheet, the months of December 97 was used. The month was multiplied by 12 to come up with the annual.

We asked for documentation. The company said that the information is housed in their HUPCAP database. The data is not readily available, but they company provided Execunet data for 12 months and 6/99. This data showed:

Actual Hubcan Deta Attack & To Flow Thru Worksheet data JULY 98 WORKSHEET Intralata 12 mos and Intralata 12 mos avg 06/01/99 December 97 **Total Minutes** DIFF **Total Minutes** himilate 12 mos avg Interlate 12 mos end 06/01/99 December 97 Total Minutes **Total Minutes** Intrastate 12 mos Intrastate 12 mos MCI-One Savings avg December 97 end 6/1/99 Total Minutes Total Minutes Exercises - OCT 98 WORSHEET Intralata 12 mos and Intralata 12 mos avg 06/01/89 June 98 Total Minutes **Total Minutes** Diff interlate 12 mos avg Interleta 12 mos and 06/01/99 June 98 **Total Minutes Total Minutes** MCI ONE SAVINGS Intrastate 12 mos intrestate 12 mos end 6/1/99 8e enuL gvs **Total Minutes** Total Minutes 10-1082 000046

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: Julie Deved WILITY: MCI Doll Com
REQUEST NUMBER: AUDIT MANAGERY DATE OF REQUEST: 1949 AUDIT PURPOSE: Ourse
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: DINCIDENT TO AN INQUIRY ITEM DESCRIPTION:
Staff proposed the atland schedule comparem the operal pheit dute for July + Oct 98 to the the tables on the flow three worksheet for assured MOU's.
Please Explain why The Oct 98 Intra late MOUS
do not agree.
TD: ALDIT MANAGER Kuth Voung THE REQUESTED RECORD OR DOCUMENTATION: (1) A HAS BEEN PROVIDED TODAY THE REQUESTED RECORD OF DOCUMENTATION:
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY (3) AND IN MY OPINION. ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183. 365.083, OR 367.156, F.S., TO MAINTAIN CONTINUED CONFIDENTIAL HANLING OF THIS MATERIAL. THE UTILITY OR OTHER PURSUN MIST. HITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE. FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006. F.A.C.
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM) (SIGNATURE AND TITLE OF RESPONDENT) Mgr
DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain

41/US/BB NED 15:59 FAX 770 284 5533

10/29/1999 09:28

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MCI WORLDCOM REG AFFAIRS FPSC MIAMI

PAGE UD

COMPANY:

TITLE:

PERIOD: DATE: AUDITOR:

MCI WORLDCOM VISION BACKUP JULY AND OCT 98 **OCTOBER 28, 1999**

RKY

WP NO.

45-1/6

INTER JULY 98 INTRA **JULY 98** INTER **OCT 98**

OCT 9B

Vision-Outbound **SW Peak** SW Off Peak Ded Peak Ded Off Peak Card

Vision-Inbound * SW Peak SW Off Peak **Ded Peak** Ded Off Peak

Power Switched Dedicated Card

Back up Spraw & short FLOW Thre Workstor.

Intralata % = Total or July 98 and

10-11 PL

000048

0g

H. TIMO WW

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST
TO: NOTICE OF INTENT
TO: Spille Williss UTILITY: MCL O
FROM: (AUDITOR PREPARING REDUEST)
REQUEST NUMBER: 12 SEC 1800 Thru DATE OF REQUEST: 11/4/81
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 11/26/19
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: I INCIDENT TO AN INQUIRY
ITEM DESCRIPTION:
Re: VUET SAMILE
The attend was requested in our
physe correspond of 11/11/17
Messes #13 In Soth north
+ #23 4n 10/10/198
TO: ALDIT MANAGER Kuth Young DATE: 12/1/99
THE REQUESTED RECORD OR DOCUMENTATION:
(1) AS BEEN PROVIDED TODAY (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE HADE AVAILABLE BY
(3) AND IN MY OPINION. ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN
364, 183, 366, 083, OR 367, 156, F.S. TO HAINTAIN CONTINUED CONFIDENTIAL HAVOLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MIST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A RELIEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22,006, F.A.C.
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(SIGNATURE AND LITTLE OF RESPONDENCE)
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QUESTIONS REGARDING VNET TARIFF

This is to summarize our conversation of November 11, 1999 and the verbal requests on that date.

According to my review of the four company invoices sent to me for the VNET tariff; I found that the FI Intrastate, intertata and intralata calls did not match the tariff for the invoice dated 9/10/98. The 9/10/98 invoices included August 98 calls. According to the PSC order the reduced rates should have gone into effect July 1, 1998. As you explained the rate may have been changed on a later invoice with a credit for the months that the customer was not billed the reduced rate. You said you would find out when the tariffs went into effect and if a credit was given for the reduction.

Provide the invoices for the month the reduced tariff went into effect showing the credit, the calculation of the credit, and the reduced tariff FI to FI calls.

Also, for the 5/10/99 invoices, the four company invoices again did not match the tariff that should have gone into effect on October 1, 1998. You said you would look into this. It may be that the rate was increased after the October 1, 1998 reduction. If this is the case, provide the same customer invoices for the month the October 1, 1998 reduction went into effect.

If the effective date is not October 1, 1998, provide the invoices for the month the reduced tariff went into effect showing the credit, the calculation of the credit, and the reduced tariff for FI to FI calls.

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FLURIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: ADDIT HANAGER THE REQUESTED RECORD OR DOCUMENTATION: (2) ADDIT HANAGER (3) ADDIT HANAGER THE REQUESTED RECORD OR SPONIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY (3) AND IN HY OPINION, ITEM(S) SALISS 356,093 OR 357 156, F.S. TO HAIMAIN CONTINED OF THE MATERIAL THE UTILITY OR OTHER PERSON HAIM, THINK IZ UNS AFTER THE ADDIT BATOR OF THE RECORDS AND REPORTING, REFER TO RULE 25-22,006, F.A.C.	NOTICE OF INTENT	
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(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM) -	(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM) -	
(SIGNATURE AND TITLE OF RESPONDENT)	(SIGNATURE AND TITLE OF RESPONDENT)	
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DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain PSC/AFA-6 (Rev.2/95)	UISIKIBUIIUN:	

COMPANY:

MCI WORLDCOM

PERIOD:

SAMPLE OF RESIDENTIAL RATE ELEMENT
EXECUNET
INVOICES DATED APRIL 98 - TARIFF EFFECTIVE 3/1/98
INVOICES DATED APRIL 99 - TARIFF EFFECTIVE 10/1/98

DATE:

NOVEMB ER 15, 1999

AUDITOR:

RKY

WP NO.

57-1/1

SOURCE: INVOICES DATED APRIL 98 AND MAY 99 FOR EXECUNET SERVICE TARIFFS DATED MARCH 1, 1998 AND OCTOBER 1, 1998 WP 46-1/1 and 6-1/3

FOOTNOTES

	From	То		Peak/off peak	Minutes	Amount	Per Min
NOTE A - 57	=1/2 -		004	Dani.			
Apr 3, 98	> while	904	904	Peak		0.75	0.
April 17, 98) 3, 90.	904	904 904	Peak Peak		3 0.75 3 0.75	0.3
Arp 24, 98	•	904	904	Peak	•	3 0.75	0.
Asserding to	the tariff dated Marc	h 1, 1998 (46-1/1)	the peak intra	lata tariff is .12cents	per minute		
	5 SAmple		•		•		
NOTED	WI/3 - 1.0 '						
aPRIL 19, 98	20.1	352	352	Off Peak	•	0.16	0
-theoreting to	the tariff dated Marc	h 1, 1998 (46-1/1)	the off peak i	ntralata tariff is .08 ce	nts per minute		
		, 1000 (10 1.17)					
NOTE	Sample No.9						
May 10, 99	کر', ط	352 352	352	Peak		1 0.25	0
May 14,99	ho. ,	352	352	Off Peak	;	3 0.39	C
		•					
According to	the tariff dated Octo	ber 1, 1998 (46-1/3	3), the peak in	tralata tariff is .10 ce	nts.		
According to	the tariff dated Octo	ber 1, 1998 (46-1/3 ber 1, 1998 (46-1/3	3), the peak in 3), the off pea	tralata tariff is .10 ce k intralata tariff is .07	nts. cents.		
to the serving to	the tariff dated Octo	ber 1, 1998 (46-1/3 ber 1, 1998 (46-1/3	3), the peak in 3), the off pea	tralata tariff is .10 ce k intralata tariff is .07	nts. cents.		
NOTE D - 57	the tariff dated Octo	ber 1, 1998 (46-1 <i>/</i> 3	3), the off pea	k intralata tariff is .07	cents.	4 254	0.460
NOTED-57	the tariff dated Octo	ber 1, 1998 (46-1/3 ber 1, 1998 (46-1/3 407	3), the peak in 3), the off pea 941	tralata tariff is .10 ce k intralata tariff is .07 Peak	nts. cents. 2	1 3.54	0.168
NOTE D - 57 MAR 12, 98	the tariff dated Octo	ber 1, 1998 (46-1/3	3), the off pea	k intralata tariff is .07 Peak	cents.	1 3.54	0.168
NOTE D - 57 MAR 12, 98	the tariff dated Octo	ber 1, 1998 (46-1/3 407 h 1, 1998 (46-1/1) 1	3), the off pea	k intralata tariff is .07	cents.	1 3.54	0.168
NOTE D - 57 MAR 12, 98	the tariff dated Octo	ber 1, 1998 (46-1/3 407 h 1, 1998 (46-1/1) 1	3), the off pea	k intralata tariff is .07 Peak	cents.	1 3.54	0.168
NOTE D - 57 MAR 12, 98	the tariff dated Octo	ber 1, 1998 (46-1/3 407 h 1, 1998 (46-1/1) 1	3), the off pea	k intralata tariff is .07 Peak	cents.	1 3.54 2 2.16	-

According to the tarif dated March 1, 1998 (46-1/1) the peak interlata tarif is .25 cents.

10-13 pa-

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: UTILITY: FROM: TO: The Wans Fruit fruit
REQUEST NUMBÉR: AUDIT PURPOSE: AUDIT PURPOSE: (AUDITUR PREPARING REQUEST) DATE OF REQUEST: [AUDITUR PREPARING REQUEST)
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: Outside of an inquiry Outside of an inquiry The lose provide knowed to the attacked greations regarding The VNET
Sungle.
TO: AUDIT MANAGER / Cuth Young DATE: 12/17/99 THE REQUESTED RECORD OR DOCUMENTATION: (1)
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY AND IN MY OPINION, ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM) (SIGNATURE AND TITLE OF RESPONDENT) (SIGNATURE AND TITLE OF RESPONDENT)
DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain PSC/AFA-6 (Rev.2/95)

Please explain the following items:

- 1. Account no. 30th bills are for a calling card. The minutes times the tariff do not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please relate this to the VNET tariff sent to us. (#3)
- 2. Account the tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account. (#5)
- 3. Account for the 12/10/98 invoice, the calling card minutes times the tariff does not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please relate this to the VNET SW-DED tariff. (# G)
- 4. Account Both months are calling card bills. The day calls calculate correctly. However, \$.40 cents is added to the night calls and this is not on the tariff. Please explain. (# ?)
- 5. Account the same amounts on the bill. Enclosed is one page from the bill sent to us. Please related this to the VNET tariff sent to us. (# /o)
- 6. Account Both months do not agree with the VNET tariff. What tariff is this? If VNET, please show how it is calculated. (4+12)
- 7. Account the tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account it is
- 8. Account Part of these bills is for a calling card. What tariff was used? Is it VNET? Please calculate for us. It also appears that \$.40 has also been added to the night calls when this is not on the tariff. Please explain.
- 9. Account Missing the October 98 invoice. For the Dec. 98 invoice, the minutes times the tariff does not result in the same amounts on the bill. (# 43)
- 10. Account Invoices for both months are missing. (#/3)

the #'s in parenthesis are the Sargle H's on the list Dougholly Sent to you.

CONFIDENTIAL 10-14P2

Commissioners:
JOE GARCIA, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
E. LEON JACOBS, JR.



3625 NW 82nd AVENUE SUITE 400 MIAMI, FLORIDA 33166-7602

Public Service Commission

December 10, 1999

Ms. Julie L. Davis MCI WorldCom Law and Public Policy Six Concourse Parkway Suite 3200 Atlanta, Ga 30328

Re:

IXC Flow Through Worksheet Audits of

MCI WorldCom and WorldCom Technologies

Dear Ms. Davis:

Enclosed is our request No. 14 regarding the Vnet sample. Also, enclosed is a copy of our request No. 13 regarding questions about the Execunet sample.

As you mentioned in your voice mail to me, you should have the rest of the information we requested by December 20th. Below is a summary of what I believe is outstanding. Please let me know if you agree.

MCI WorldCom

- 1. Answer to Request No. 13 (requested on 11/16/99).
- 2. Answer to Request No.14.

WorldCom Technologies

- 1. Request No. 11- Sample of World One Switched Customers (requested on 10/13/99)
- 2. Request Nos. 10 and 12 Documentation for WNS Transcend Element and follow up (requested 9/9/99 and 11/17/99).
- 3. We received the Classic Carrier Sample but did not receive the instructions on how to read the invoices as we discussed approximately two to three weeks ago.

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BLVD • TALLAHASSEE, FL 32399-0850

Ms. Julie Davis December 10, 1999 Page 2

Please let me know as soon as possible if there will be any problems meeting the December 20th date. Thanks you.

Yours truly,

Ruth K. Young Professional Accounting Specialist

Enclosures

cc: Kathy Welch, Supervisor Miami District Office

CONFIDENTIAL

F)RIDA PUBLIC SERVICE COMM SION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: UTILITY: FROM: REQUEST AUDIT PU	NUMBER: AUDITOR PR (AUDITOR PR DATE OF REQUEST:	EPARING, REQUEST)
	REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENCE CRIPTION:	ENT TO AN INQUIR DE OF AN INQUIRY
Re:	Execunet Sangle	
The a	illached schedule delands 5 dis crapancies ilculating the taiff for execured to A through E) Please explain the customer was billed higherent tow the tariff	
TO: AUD	IT MANAGER DATE:	
	FED RECORD OR DOCUMENTATION:	
an \square	HAS BEEN PROVIDED TODAY	
(2)	CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY	
(3)	AND IN MY OPINION. ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, TO MUST. WITHIN 21 DAYS AFTER THE ALDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION REPORTING. REFER TO RULE 25-22.006, F.A.C.	FORMATION AS DEFINED I E UTILITY OR OTHER PERSO TION WITH THE DIVISION (
(4)	THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)	
	(SIGNATURE AND TITLE OF RES	PONDENT)
DISTRIBUTION White: Uti Pink: Audion Canary: Uti	ON: If ty Complete and Return to Auditor to File Copy Ility Retain	000057

COMPANY: TITLE:

MCI WORLDCOM RECALCULATION OF

BLENDED RATES FOR VNET TARIFF

PERIOD: DATE:

WP NO.

JULY 1, 1998 and OCTOBER 1, 1998

AUDITOR:

JANUARY 7, 2000

RKY

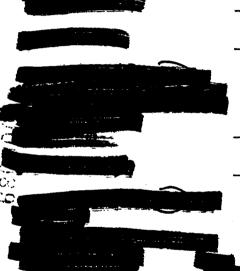
45-1-5-1

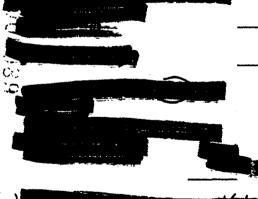
INTERLATA

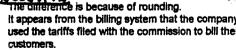
VNET SW-SW **INCLUDING CARD**

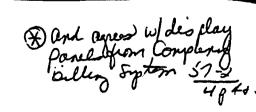
Effective Effective JULY 1, 1998 JULY 1, 1998 Calculation using Calculation using billing system wP billing system wP (no. 57-2/4) INTERLATA INTERLATA PEAK OFF PEAK

Effective Effective **OCTOBER 1, 1998 OCTOBER 1, 1998** Calculation using Calculation using billing system wP billing system wP no. 57-2/4 INTERLATA no. 57-2/4 INTERLATA PEAK OFF PEAK









The difference is because of rounding.

It appears from the billing system that the company used the tariffs filed with the commission to bill their

An example of how the different methods of calculating this bring about the same results that are billed to the customer, is included on WP No.57 26 page up.

tive OBER 1, 1998 Ilation using System wP 7-2/4 -4 ALATA PEAK
0.0448 0.1043 0.1491 0.1493
(0.0002)
•

An example of how the different methods of calculating this bring about the same results that are billed to the customer. is included on WP No 57-2/6 page two.

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MCI WORLDCOM COMPANY: 1/11/1/00 **VISION BACKUP** TITLE: **JULY AND OCT 98** PERIOD: DATE: **OCTOBER 28, 1999 AUDITOR:** 45-1/6 WP NO. movis **INTRA INTER** INTER **INTRA JULY 98 OCT 98 OCT 98 JULY 98** mochens (A) Vision-Outbound **SW Peak SW Off Peak Ded Peak Ded Off Peak** Card Vision-Inbound * **SW Peak SW Off Peak Ded Peak Ded Off Peak Power Switched Dedicated** Card Company back of. or July 98 and for Oct. 98 Intralata % = Per Co. (47-1 pay 2 E A. See 45-1
The difference is in those twiffs that did not changes - no changes - no changes - no changes and freeze or and freeze poly not material CONFIDENTAL

11/03/99 WED 15:57 FAX 770 284 5533 -0%

MCI WORLDCOM REG AFFAIRS

Ø 003

B

Letter to Ruth Young November 3, 1999 Page Two

Request Number 11 regarded the discrepancy between Staff's calculations of the October 1998 intraLATA Vision minutes of use and those reported on the flow through worksheet.

In MCIWORLDCOM's review of this request we found some additional errors. As a result, we are providing a new calculations for both the July and October Vision minutes.

makerel all and the property

On the July worksheet, MCIWORLDCOM reported a total of minutes for Vision/interLATA and minutes for intraLATA. In recalculating these minutes, MCIWORLDCOM found errors in both the original calculations provided on the flow through worksheet and in Staff's calculations. As you can see in attachment A, the new interLATA minutes are fine and the intraLATA minutes are fine and the intraLATA minutes are fine and the intraLATA minutes are calculations do not change the IXC Rate change amount.

The difference in Staff's calculations for the intraLATA minutes versus those reported on the flow through worksheet is due to the fact that the spreadsheet provided to Staff listed minutes for all services categories including those that did not experience a rate change. After subtracting out the minutes that did not include rate changes, MCIWORLDCOM's new calculations agree with those initially provided on the October flow through worksheet.

Requests 8 and 9 have been received and copies of the requested customers' invoices will be provided as soon as possible.

Please feel free to contact me with any additional concerns regarding this matter.

Sincerdy,

Julie L/ Davis

Regulatory Manager

Attachment

CONFIDENTIAL

45-1

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COMPANY:

TITLE:

MCI WORLDCOM
SAMPLE OF RESIDENTIAL RATE ELEMENT

EXECUNET

PERIOD:

INVOICES DATED APRIL 98 - TARIFF EFFECTIVE 3/1/98 INVOICES DATED MAY 99-TARIFF EFFECTIVE 10/1/98

DATE: **AUDITOR:** **NOVEMB ER 15, 1999 RKY**

WP NO.

57-1/1

SOURCE: INVOICES DATED APRIL 98 AND MAY 99 FOR EXECUNET SERVICE TARIFFS DATED MARCH 1, 1998 AND OCTOBER 1, 1998 WP 46-1/1 and 6-1/3

FOOTNOTES

	From	То		Peak/off peak	Minutes	Amount	Per Min
Date NOTE A - 57-1/	2						
Apr 3, 98 >	cample 5	904	904	Peak		3 0.75	0.25
April 17, 98	N. 70. 2	904	904	Peak		3 0.75	0.25
Arp 24, 98	•	904	904	Peak		3 0.75	0.25
According to the	tariff dated March	1, 1998 (46-1/1)	the peak intra	lata tariff is .12cents p	er minute		
	SAmple	•					
aPRIL 19, 98	~ ~°9,	352	352	Off Peak		1 0.16	0.16
m: 1/1/2 10, 00	• •	002	332	on roun		0.10	0.10
According to the	tariff dated March	ı 1, 1998 (46-1/1) I	he off peak in	ntralata tariff is .08 cei	nts per minute		
NOTER	ale						
May 10, 99	- Shuk	352	352	Peak		1 0.25	0.25
May 14,99	Sample No.9	352 352	352	Off Peak		3 0.39	0.13
According to the	tariff dated Octob tariff dated Octob	er 1, 1998 (46-1/3 er 1, 1998 (46-1/3), the peak in), the off peal	tralata tariff is .10 cen k intralata tariff is .07 c	ts. cents.		
- According to the	tariff dated Octob	er 1, 1996 (46-1/3 er 1, 1998 (46-1/3), the peak th), the off peal	tralata tariff is .10 cem k intralata tariff is .07 (is. cents.		
NOTE U - 57-17	tariff dated Octob	er 1, 1998 (46-1/3 er 1, 1998 (46-1/3), the peak in), the off peal 941	tralata tariff is .10 cen k intralata tariff is .07 (Peak	ts. cents. 2	1 3.54	0.168571
NOTE D - 57-11: MAR 12, 98	tariff dated Octob	er 1, 1998 (46-1/3 407), the off peal	k intralata tariff is .07 (cents.	1 3.54	0.168571
NOTE D - 57-11: MAR 12, 98	tariff dated Octob	er 1, 1998 (46-1/3 407), the off peal	k intralata tariff is .07 (cents.	1 3.54	0.168571
NOTE D - 5/-11: MAR 12, 98	tariff dated Octob	er 1, 1998 (46-1/3 407), the off peal	k intralata tariff is .07 (cents.	1 3.54	0.168571

According to the tarif dated March 1, 1998 (46-1/1) the peak interlata tarif is .25 cents.

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CONFIDENTIAL 10-14PC

FLC IDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: UTILITY: FROM: (AUDIT MANAGERY)	(AUDITOR PREPARING REQUEST)
REQUEST NUMBER: 14 AUDIT PURPOSE: LXC, 7-low 1 true	DATE OF REQUEST: 12/10/99
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY:	12/20/99
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST	IS MADE: INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
ITEM, DESCRIPTION:	
those promple browners;	to the
attacked grestione regard	in The VNet
Tengles.	<u> </u>
_3	
TO: AUDIT MANAGER	DATE:
THE REQUESTED RECORD OR DOCUMENTATION:	
(1) HAS BEEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE	
(3) AND IN MY OPINION, ITEM(S) 1S(ARE) PROPRIETARY AND 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL I MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.	CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)	
	(SIGNATURE AND TITLE OF RESPONDENT)
	1
DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain	10-14° cooots
CUNICE OF STREET	PSC/AFA-6 (Rev.2/95)

REQUEST NO	14	
FOLLOW UP TO		SAMPLE

Please explain the following items:

			nes the tariff do not result	in
the same amounts on the t		ne bill sent to us.	Please relate this to	
the VNET tariff sent to us.	(#3)			

- 2. Account The tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account. (#5)
- 3. Accound For the 12/10/98 invoice, the calling card minutes times the tariff does not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please relate this to the VNET SW-DED tariff. (# G)
- 4. Account Both months are calling card bills. The day calls calculate correctly. However, \$.40 cents is added to the night calls and this is not on the tariff. Please explain. (# ?)
- 5. Account These bills are calling card bills. The minutes times the tariff do not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please related this to the VNET tariff sent to us. (# /o)
- 6. Account Both months do not agree with the VNET tariff. What tariff is this? If VNET, please show how it is calculated. $(\frac{1}{4})$
- 7. Account the tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account. It //
- 8. Account Part of these bills is for a calling card. What tariff was used? Is it VNET? Please calculate for us. It also appears that \$.40 has also been added to the night calls when this is not on the tariff. Please explain.
- 9. Account Missing the October 98 invoice. For the Dec. 98 invoice, the minutes times the tariff does not result in the same amounts on the bill. (# 43)
- 10. Account Invoices for both months are missing. (# /3)

the #'s in parenthesis are the sample H's on the list Porigholy sent to you.

10-14/8 CONFIDENTIAL COMPANY:

MCI WORLDCOM

TITLE:

SUMMARY

PERIOD:

JULY 98 AND OCT 98 FLOW THRU REDUCTIONS

FOR ACCESS CHARGES

DATE:

OCTOBER 28, 1999

AUDITOR:

RKY

WP NO.

45 SUMMARY

REVIEW OF INTEREXCHANGE FLOW THROUGH WORKSHEETS FOR JULY 98 AND OCT 98.

JULY 98 - WP 45-1

I. Origin of Study period intrastate MOU to come up with annual savings to MCI because of the reduction in access charges (amount to pass through to customers). WP 45-1 is the flow through worksheet for July 98.

A. The calculation of the reduction to MCI is based on the rate change from GTE and Sprint times a study period Intrastate MOU.

Rate Change

The rate change was traced to a letter from the PSC. No discrepancies noted.

Study Period Intrastate MOU's used

The back up from the company shows that the GTE MOUs come from the month of March 98 (45-1/1). We requested that the company supply copy of the bills from GTE since these are actual. The company says that they do not receive hard copies from GTE or Sprint. The bill is sent electronically and loaded into the company Financial Operations Organizations. The infor path or that the company provided us is from this data base.

The back up from the company shows that the Sprint MOUs come from the month of May 98 actual (45-1/2). We requested the actual bills but received the same answer as for GTE bills above.

We could request other months and compare but the IXC Flow through worksheet from the commission only asks for one month or more. They have complied with the work sheet using one month.

We cannot substantiate the amount of the minutes used as the bills from GTE and Sprint are not available and time limits preclude us from auditing their data through the computer. Also, we are testing to see if bills were actually lowered. WP 57 and 58,

B. The reduction received from the local companies for lowered access charges as calculated

CONFIDENTIAL

45p1 97

above is then passed on to the customer. The company calculated this as follows on their flow thru worksheet (45-1). Note that the calculation for residential and business are different.

1. For each rate element that the company intends to reduce, the Annual Intrastate MOUs are determined. The method and audit of this follows:

Residential - Staff decided to test one of the two residential rate elements reduced. The rate element selected was Execunet. First level documentation for the Annual Intrastate MOUS backed up the flow thru work sheet. The second level of documentation did not agree for both interlata and intralata for July 98 and Oct 98 flow thru worksheets. See 45-13-1 Request #100 company to explain. See Audit Dis cluster follows.

Business-Staff decided to test the documentation for two of the four business rate elements. They are Vision and VNET. The company provided backup details. Each business rate element includes the current rates and new rates and the change. 45-1/5. The annual MOUs on the backup are added to come up with the amounts on the flowthru worksheet 45-1. Staff added Vision and VNET. The results are on 45-1/4 for VNET. No discrepancies noted. The results for Vision are on 45-1/6. There are discrepancies for the Oct 98 Intralata Annual Intrastate MOUs. Request company to explain.

The first level of back up from the company appears to agree with the flow thru work sheet for two rate elements for and VNET for annual intrastate MOUs. As stated above, there is a discrepance for Vision. Also, we still waiting for data to back up the first level. See 47-1 page two. Request 3 (c) HE) No backup duty available

2. The Annual dollar reduction for each rate element is determined. This is on WP no. 45-1/5 for business and 45-3/3 for residential. The method and audit of this follows:

<u>Residential</u> — In order to determine the annual dollars reduction for Execunet, the company calculated a blended rate for all parts of both the old and new the rate elements and determined the difference to apply to the annual intrastate MOUs. The actual difference is on WP 45-1/3 and the calculation of the blended rate is on 47-1/2pg 2. There were no discrepancies in the calculation and the method appears reasonable.

Business — The backup for the annual dollar reduction is on WP 45-1/5. The company calculated the annual rate reduction by (1) determining the difference in the old and new rate and (2) applying the difference to the annual intrastate MOU's for each rate element. For example, Vision, has different rates for switched, dedicated, card, offpeak and on peak. Each rate was recalculated and the reduction recalculated. The annual dollar amount reduction for each part was added together for inter and intralata separately to come up with the amounts used



on the flow through work sheet. (45-1).

Before the annual reductions were recalculated, staff traced both the old and new rates to the tariff filed with the Commission. No discrepancies noted on these two elements. Staff also recalculated the annual dollar reductions at a random basis. See 46-2 for questions and resolutions.

Staff's recalculation of the annual dollars reductions for VNET is on WP 45-1/7 and Vision on WP 45-1/7. No discrepancies noted.

3. The interexchange rate change on the flow thru work sheet is a result of the annual dollar reduction calculated in (2) above divided by the Annual Intrastate MOUs. This is a fall out of the other two calculations. The rate changes to audit are the actual change in rates that will be seen on the bills are those included in (2) above. The sample is on WP 57 and 58.

October 98 WP 45-2

The flow thru worksheet for October 98 is calculated the same way and the same type of back up was provided as for July 98 above.

- A. Calculation of the reduction to MCI is base on the rate change from GTE and Sprint times a study period Intrastate MOU. The audit procedures are the same as above and the results are the same.
- The reductions passed on to the customer are calculated by the company the same as in July 98. Staff used the same procedures as above.

Results:

Annual Intrastate MOUs-Residential -- Results are as above. Regrest To See aucht des chour follow Jurnay Business The work papers for the current rates and new rates and the change are on 45-2/5. The annual MOUs on the backup are added to come up with the amounts on the flow thru worksheet 45-2. Staff added Vision and VNET. The results are on 45-2/4 for VNET. No discrepancies noted. For Vision the results are on 45-1/6 and the minutes of use in the backup does not agree with the flow through worksheet for Intralata for October 98. Ask company to explain. See exploration 45.1

Annual dollar reduction for each rate element is determined. 45-2/5 for business and 45-2/3 for residential.

Residential

Residential - In order to determine the annual dollars reduction for Execunet, the company calculated a blended rate for all parts of both the old and new the rate elements and determined the difference to apply to the annual intrastate MOUs. The actual difference is on WP 45-2/3 and the calculation of the blended rate is on 47-1/2pg 2. There were no discrepancies in the calculation and the method appears reasonable.

CONFIDENTIAL 45 p3

Business

The same procedures as for July 98 were Used for October 98. However, when tracing rates used in the back \up to the tariff, staff noted that one tariff did not agree. On WP45-2/5 (company provided information) for Vision Card Intralata, the new rate says tariff says .2138. The effect on the Flow thru work sheet is upland on WP 41.2 a amount one immunol pass) on disclosure.

Staff's recalculation of the annual dollars reductions for VNET and Vision are on WP 45-2/6. No discrepancies noted

INTEREXCHANGE RATE

Same as above.



AUDIT DISCLOSURE 3

SUBJECT: ESTIMATED ANNUAL INTRASTATE "EXECUNET SERVICE"

MINUTES OF USE ON FLOW THROUGH WORKSHEETS FOR JULY 98

AND OCTOBER 98

STATEMENT OF FACTS: On the July and October 1998 Interexchange Carrier Flow-Through Work Sheets, the company used a two step calculation to determine the reduction to customers.

The first calculation is the rate change from the Local Exchange Company times an estimated Interexchange Carrier study period Intrastate Minutes of Use. This results in a monthly and then annualized amount to be reduced on the Interexchange Carrier customers bills. The second part of the company's calculation is a detail of the rate elements the company intends to reduce to come up with the results in part one. The annual reduction for each rate element is calculated using the following formula.

"Estimated Annual Intrastate Minutes of Use times the Interexchange Carrier Rate Change = Annual Reduction".

A comparison of the estimated Minutes of Uses on the Flow-Through Work Sheet for "Execunet" Service, with the actual Minutes of Use provided by the company showed the estimated Minutes of Use were higher than the actual.

Execunet Service Inter LATA

July 98
Estimated Annual Intrastate Minutes of Use on Flow-Through Work Sheet

Actual Annual (12 months ended 6/1/99)
Intrastate Minutes of Use per Company prepared data

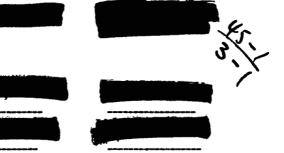
Difference

4505

October 98
Estimated Annual Intrastate Minutes of Use on Flow-Through
Work Sheet

Actual Annual (10/98 - 7/99 Annualized)
Intrastate Minutes of Use
per Company prepared data

Difference



The use of a higher estimated Minutes of Use on the worksheet than the actual amount, resulted in a smaller reduction to the customer.

A schedule was prepared which shows a comparison and the dollar effect of the difference because of the Minutes of Use. The estimated and actual minutes for both "Flow -Through Work Sheets" are on company prepared schedules which follow this disclosure.

The company stated that if you add in the new product "MCI One Advantage" launched July 98, the rate reduction is greater than required by the "Flow-Through Work Sheets" for both months. It states that this new product has the lowest in state rates and many existing "Execunet" customers migrated to this new tariff. The company's calculation with the "MCI One Advantage Rate" element added in is shown on the attached company schedules.

The "MCI One Advantage Rate" is not used to calculated the annual dollar reduction on either "Flow- Through Work Sheet."

As stated in the scope section of this audit, the company could not provide the data to support the estimated minutes of use used for the calculation of the reduction for "Vision" and "Vnet" Business Services requested. The company stated that flow through process had gone through numerous changes and that the employees who participated in the two flow through processes were no longer with the company. The process used today is different.

OPINION: The attached schedule shows that the estimated Minutes of Use compared with the actual would result in a smaller annual dollar reduction than calculated on the "Flow-Through Work Sheets" for July 1998 in the amount of Thus causing the customers to not get a pass through of these amounts.

The company schedules adding in the "MCI One Advantage Rate" show a higher rate reduction than required on the "Flow-Through Work Sheets." See the schedules attached to this Disclosure. Since the company said that they added the new product (MCI One Advantage Rate) in July 1998, it would seem that these rates were in effect before the October 1998 flow-through

Commissioners:
JOE GARCIA, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
E. LEON JACOBS, JR.



3625 NW 82nd AVENUE SUITE 400 MIAMI, FLORIDA 33166-7602

Bublic Service Commission

December 10, 1999

Ms. Julie L. Davis
MCI WorldCom
Law and Public Policy
Six Concourse Parkway
Suite 3200
Atlanta, Ga 30328

Re:

IXC Flow Through Worksheet Audits of

MCI WorldCom and WorldCom Technologies

Dear Ms. Davis:

Enclosed is our request No. 14 regarding the Vnet sample. Also, enclosed is a copy of our request No. 13 regarding questions about the Execunet sample.

As you mentioned in your voice mail to me, you should have the rest of the information we requested by December 20th. Below is a summary of what I believe is outstanding. Please let me know if you agree.

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- 2. Request Nos. 10 and 12 Documentation for WNS Transcend Element and follow up (requested 9/9/99 and 11/17/99).
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CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BLVD • TALLAHASSEE, FL 32399-0850

Ms. Julie Davis December 10, 1999 Page 2

Please let me know as soon as possible if there will be any problems meeting the December 20th date. Thanks you.

Yours truly,

Ruth K. Young Professional Accounting Specialist

Enclosures

cc: Kathy Welch, Supervisor Miami District Office

CONTIDENTIAL

F)RIDA PUBLIC SERVICE COMM SION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

AUDIT F	REQUEST THE REFERENCE RU	FOLLOWING ITEM LE 25-22.006.	(S) BE PROVID	•	,	REQUEST:	EPARING, RI	N INOUIR
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THE REQUE	STED RECORD OR DO	CUMENTATION:				DATE:		
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(1) [2] (2) [3]	ISTED RECORD OR DO I HAS BEEN PROVID CANNOT BE PROVID AND IN MY OPINIO 364.183, 366.093, MIST, WITHIN 21 D RECORDS AND REI	CUMENTATION: DED TODAY DED BY THE REQUES N. ITEM(S) OR 367.156. F.S. TO N AYS AFTER THE AUDIT EPORTING. REFER TO	TED DATE BUT WII IS(ARE) PROPI MINIAIN CONTINUED (XIT CONFERENCE, FIL RULE 25-22.006	LL BE MADE A RIETARY AND (INFIDENITAL H E A REQUEST F , F.A.C. EMORANDUM)	CONFIDENTIAL NOLING OF THI OR CONFIDENTI	BUSINESS INI S MATERIAL, TI AL CLASSIFICA	FORMATION A E UTILITY O TION WITH T	

COMPANY: TITLE:

MCI WORLDCOM

SAMPLE OF RESIDENTIAL RATE ELEMENT

PERIOD:

EXECUNET INVOICES DATED APRIL 98 - TARIFF EFFECTIVE 3/1/98 INVOICES DATED MAY 99- TARIFF EFFECTIVE 10/1/98

NOVEMB ER 15, 1999

DATE: **AUDITOR:**

RKY

WP NO.

57-1/1

SOURCE: INVOICES DATED APRIL 98 AND MAY 99 FOR EXECUNET SERVICE TARIFFS DATED MARCH 1, 1998 AND OCTOBER 1, 1998 WP 46-1/1 and 6-1/3

FOOTNOTES

Occaso	Date	From	То		Peak/off peak	Minutes	Amount	Per Min
a e e	NOTE A - 57-1/2 Apr 3, 98	mele	904	904	Peak		3 0.75	0.25
	April 17, 98	24, 10.2	904	904	Peak		3 0.75	
	Arp 24, 98	, 6	904	904	Peak		3 0.75	0.25
are't.	According to the	tariff dated Marc	h 1, 1998 (46-1/1)	the peak intra	lata tariff is .12cents į	per minute		
ــــــــــــــــــــــــــــــــــــــ	aPRIL 19, 98	209	352	352	Off Peak		1 0.16	0.16
Ver T.				the off peak in	tralata tariff is .08 ce	nts per minute		
-	Move 40, 00	Stubie	252	352	Peak		1 0.25	0.05
	NOTE C - 37-7-7- May 10, 99 May 14,99	70.9	352	352	Off Peak		3 0.39	0.25 0.13
au't.	NOTE D - 57-175 MAR 12, 98	Jungle Da 17	407	941	ralata tariff is .10 cen cintralata tariff is .07 c Peak ata tarif is .25 cents.	ts. cents. 2	1 3.54	0.168571
	Marine processing and the second	Surgice					-	-
	Apr 26, 1998	`(1	407	941	Peak	1:	2 2.16	0.18

According to the tarif dated March 1, 1998 (46-1/1) the peak interlata tarif is .25 cents.

CONFIDENTIAL

CONFIDENTIAL 10-14PC

FLL..DA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: UTILITY: FROM: Puic found	
REQUEST NUMBER: AUDIT PURPOSE: LXC, F.Cow Thru	EPARING REQUEST)
	ENT TO AN INQUIRY DE OF AN INQUIRY
Those provide knower to the attacked greation regarding The VNew Sungles.	
TO: AUDIT MANAGER DATE:	
THE REQUESTED RECORD OR DOCUMENTATION:	
(1) HAS BEEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY (3) AND IN MY OPINION. ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS I 364.183. 366.093. OR 367.156. F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL. MUST. WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFIC RECORDS AND REPORTING. REFER TO RULE 25-22.006. F.A.C.	
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)	
(SIGNATURE AND TITLE OF R	ESDONIDENT)
1	ESPONDENT
DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain	0000059
COMPERS DE SER DE LA LINE DE LA COMPERS DE LA COMPENSACIONE	PSC/AFA-6 (Rev.2/95)

REQUEST NO	
Please explain the following items	:
1. Account no. Both by the same amounts on the bill. End the VNET tariff sent to us. (#3)	C

1. Account no. Both bills are for a calling card. The minutes times the tariff do not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please relate this to the VNET tariff sent to us. (#3)

2. Account The tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account. (#5)

3. Account For the 12/10/98 invoice, the calling card minutes times the tariff does not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please relate this to the VNET SW-DED tariff. (# G)

4. Account Both months are calling card bills. The day calls calculate correctly. However, \$.40 cents is added to the night calls and this is not on the tariff. Please explain. (# 9)

5. Account These bills are calling card bills. The minutes times the tariff do not result in the same amounts on the bill. Enclosed is one page from the bill sent to us. Please related this to the VNET tariff sent to us. (# /o)

6. Account Both months do not agree with the VNET tariff. What tariff is this? If VNET, please show how it is calculated. $(\frac{1}{4})$

7. Account The tariff on these invoices appears to be VNET SW-DED. How do we tell from the bill that this is what the tariff should be? Enclosed are a few pages from this account.

8. Account Part of these bills is for a calling card. What tariff was used? Is it VNET? Please calculate for us. It also appears that \$.40 has also been added to the night calls when this is not on the tariff. Please explain.

9. Account Missing the October 98 invoice. For the Dec. 98 invoice, the minutes times the tariff does not result in the same amounts on the bill. (# 43)

10. Account Invoices for both months are missing. (# /3)

the #'s in parenthesis are the sayle H's on the list Dougholly sent to you.

10-11/8 cosseo

COMPANY:

MCI WORLDCOM

TITLE:

SUMMARY

PERIOD:

JULY 98 AND OCT 98 FLOW THRU REDUCTIONS

FOR ACCESS CHARGES

DATE:

OCTOBER 28, 1999

AUDITOR:

RKY

WP NO.

45 SUMMARY

REVIEW OF INTEREXCHANGE FLOW THROUGH WORKSHEETS FOR JULY 98 AND OCT 98.

JULY 98 - WP 45-1

I. Origin of Study period intrastate MOU to come up with annual savings to MCI because of the reduction in access charges (amount to pass through to customers). WP 45-1 is the flow through worksheet for July 98.

A. The calculation of the reduction to MCI is based on the rate change from GTE and Sprint times a study period Intrastate MOU.

Rate Change

The rate change was traced to a letter from the PSC. No discrepancies noted.

Study Period Intrastate MOU's used

The back up from the company shows that the GTE MOUs come from the month of March 98 (45-1/1). We requested that the company supply copy of the bills from GTE since these are actual. The company says that they do not receive hard copies from GTE or Sprint. The bill is sent electronically and loaded into the company Financial Operations Organizations. The infor put of that the company provided us is from this data base.

The back up from the company shows that the Sprint MOUs come from the month of May 98 actual (45-1/2). We requested the actual bills but received the same answer as for GTE bills above.

We could request other months and compare but the IXC Flow through worksheet from the commission only asks for one month or more. They have complied with the work sheet using one month.

We cannot substantiate the amount of the minutes used as the bills from GTE and Sprint are not available and time limits preclude us from auditing their data through the computer. Also, we are testing to see if bills were actually lowered. WP 57 and 58,

B. The reduction received from the local companies for lowered access charges as calculated

CONFIDENTIAL

45p1 27

above is then passed on to the customer. The company calculated this as follows on their flow thru worksheet (45-1). Note that the calculation for residential and business are different.

1. For each rate element that the company intends to reduce, the Annual Intrastate MOUs are determined. The method and audit of this follows:

Residential - Staff decided to test one of the two residential rate elements reduced. The rate element selected was Execunet. First level documentation for the Annual Intrastate MOUS backed up the flow thru work sheet. The second level of documentation did not agree for both interlata and intralata for July 98 and Oct 98 flow thru worksheets. See 45-13-18 Request #100 company to explain. See Request #100 company to explain.

Business- Staff decided to test the documentation for two of the four business rate elements. They are Vision and VNET. The company provided backup details. Each business rate element includes the current rates and new rates and the change. 45-1/5. The annual MOUs on the backup are added to come up with the amounts on the flowthru worksheet 45-1. Staff added Vision and VNET. The results are on 45-1/4 for VNET. No discrepancies noted. The results for Vision are on 45-1/6. There are discrepancies for the Oct 98 Intralata Annual Intrastate MOUs. Request company to explain.

The first level of back up from the company appears to agree with the flow thru work sheet for two rate elements for and VNET for annual intrastate MOUs. As stated above, there is a discrepance for Vision. Also, we still waiting for data to back up the first level. See 47-1 page two. Request 3 (c) HE) No backup duty available.

2. The Annual dollar reduction for each rate element is determined. This is on WP no. 45-1/5 for business and 45-3/3 for residential. The method and audit of this follows:

<u>Residential</u> — In order to determine the annual dollars reduction for Execunet, the company calculated a blended rate for all parts of both the old and new the rate elements and determined the difference to apply to the annual intrastate MOUs. The actual difference is on WP 45-1/3 and the calculation of the blended rate is on 47-1/2pg 2. There were no discrepancies in the calculation and the method appears reasonable.

Business — The backup for the annual dollar reduction is on WP 45-1/5. The company calculated the annual rate reduction by (1) determining the difference in the old and new rate and (2) applying the difference to the annual intrastate MOU's for each rate element. For example, Vision, has different rates for switched, dedicated, card, offpeak and on peak. Each rate was recalculated and the reduction recalculated. The annual dollar amount reduction for each part was added together for inter and intralata separately to come up with the amounts used



on the flow through work sheet. (45-1).

Before the annual reductions were recalculated, staff traced both the old and new rates to the tariff filed with the Commission. No discrepancies noted on these two elements. Staff also recalculated the annual dollar reductions at a random basis. See 46-2 for questions and resolutions.

Staff's recalculation of the annual dollars reductions for VNET is on WP 45-1/7 and Vision on WP 45-1/7. No discrepancies noted.

3. The interexchange rate change on the flow thru work sheet is a result of the annual dollar reduction calculated in (2) above divided by the Annual Intrastate MOUs. This is a fall out of the other two calculations. The rate changes to audit are the actual change in rates that will be seen on the bills are those included in (2) above. The sample is on WP 57 and 58.

October 98 WP 45-2

The flow thru worksheet for October 98 is calculated the same way and the same type of back up was provided as for July 98 above.

- A. Calculation of the reduction to MCI is base on the rate change from GTE and Sprint times a study period Intrastate MOU. The audit procedures are the same as above and the results are the same.
- **B.** The reductions passed on to the customer are calculated by the company the same as in July 98. Staff used the same procedures as above.

D	esi	٠1	to.	
K	25	11	16.	

Annual Intrastate MOUsResidential—Results are as above. Regard to See and the change are on 45-2/5.

The work papers for the current rates and new rates and the change are on 45-2/5.

The annual MOUs on the backup are added to come up with the amounts on the flow thru worksheet 45-2. Staff added Vision and VNET. The results are on 45-2/4 for VNET. No discrepancies noted. For Vision the results are on 45-1/6 and the minutes of use in the backup does not agree with the flow through worksheet for Intralata for October 98. Ask company to explain. See explanation 45-1

Annual dollar reduction for each rate element is determined. 45-2/5 for business and 45-2/3 for residential.

Residential

<u>Residential</u> — In order to determine the annual dollars reduction for Execunet, the company calculated a blended rate for all parts of both the old and new the rate elements and determined the difference to apply to the annual intrastate MOUs. The actual difference is on WP 45-2/3 and the calculation of the blended rate is on 47-1/2pg 2. There were no discrepancies in the calculation and the method appears reasonable.

CONFIDENTIAL 45 p3

Business

The same procedures as for July 98 were Used for October 98. However, when tracing rates used in the back \up to the tariff, staff noted that one tariff did not agree. On WP45-2/5 (company provided information) for Vision Card Intralata, the new rate says like tariff says .2138. The effect on the Flow thru work sheet is uplaned on WP 41.2 a amount one immutant pass on discussion.

Staff's recalculation of the annual dollars reductions for VNET and Vision are on WP 45-2/6. No discrepancies noted

INTEREXCHANGE RATE

Same as above.



AUDIT DISCLOSURE 3

SUBJECT: ESTIMATED ANNUAL INTRASTATE "EXECUNET SERVICE"
MINUTES OF USE ON FLOW THROUGH WORKSHEETS FOR JULY 98
AND OCTOBER 98

STATEMENT OF FACTS: On the July and October 1998 Interexchange Carrier Flow-Through Work Sheets, the company used a two step calculation to determine the reduction to customers.

The first calculation is the rate change from the Local Exchange Company times an estimated Interexchange Carrier study period Intrastate Minutes of Use. This results in a monthly and then annualized amount to be reduced on the Interexchange Carrier customers bills. The second part of the company's calculation is a detail of the rate elements the company intends to reduce to come up with the results in part one. The annual reduction for each rate element is calculated using the following formula.

"Estimated Annual Intrastate Minutes of Use times the Interexchange Carrier Rate Change = Annual Reduction".

A comparison of the estimated Minutes of Uses on the Flow-Through Work Sheet for "Execunet" Service, with the actual Minutes of Use provided by the company showed the estimated Minutes of Use were higher than the actual.

Execunet Service Inter LATA

July 98
Estimated Annual Intrastate Minutes of Use on Flow-Through
Work Sheet

Actual Annual (12 months ended 6/1/99)
Intrastate Minutes of Use per Company prepared data

Difference

CONFILITAL

4505

October 98

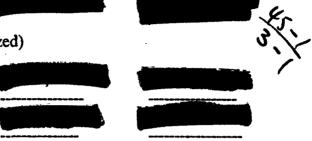
Estimated Annual Intrastate Minutes of Use on Flow-Through

Work Sheet

Actual Annual (10/98 - 7/99 Annualized)

Intrastate Minutes of Use per Company prepared data

Difference



The use of a higher estimated Minutes of Use on the worksheet than the actual amount, resulted in a smaller reduction to the customer.

A schedule was prepared which shows a comparison and the dollar effect of the difference because of the Minutes of Use. The estimated and actual minutes for both "Flow -Through Work Sheets" are on company prepared schedules which follow this disclosure.

The company stated that if you add in the new product "MCI One Advantage" launched July 98, the rate reduction is greater than required by the "Flow-Through Work Sheets" for both months. It states that this new product has the lowest in state rates and many existing "Execunet" customers migrated to this new tariff. The company's calculation with the "MCI One Advantage Rate" element added in is shown on the attached company schedules.

The "MCI One Advantage Rate" is not used to calculated the annual dollar reduction on either "Flow- Through Work Sheet."

As stated in the scope section of this audit, the company could not provide the data to support the estimated minutes of use used for the calculation of the reduction for "Vision" and "Vnet" Business Services requested. The company stated that flow through process had gone through numerous changes and that the employees who participated in the two flow through processes were no longer with the company. The process used today is different.

OPINION: The attached schedule shows that the estimated Minutes of Use compared with the actual would result in a smaller annual dollar reduction than calculated on the "Flow-Through Work Sheets" for July 1998 in the amount of Thus causing the customers to not get a pass through of these amounts.

The company schedules adding in the "MCI One Advantage Rate" show a higher rate reduction than required on the "Flow-Through Work Sheets." See the schedules attached to this Disclosure. Since the company said that they added the new product (MCI One Advantage Rate) in July 1998, it would seem that these rates were in effect before the October 1998 flow-through

worksheet was submitted and further reductions to other rate elements would have to take place other than the "MCI One Advantage Rate" in order to pass through the access charge reduction.

Made

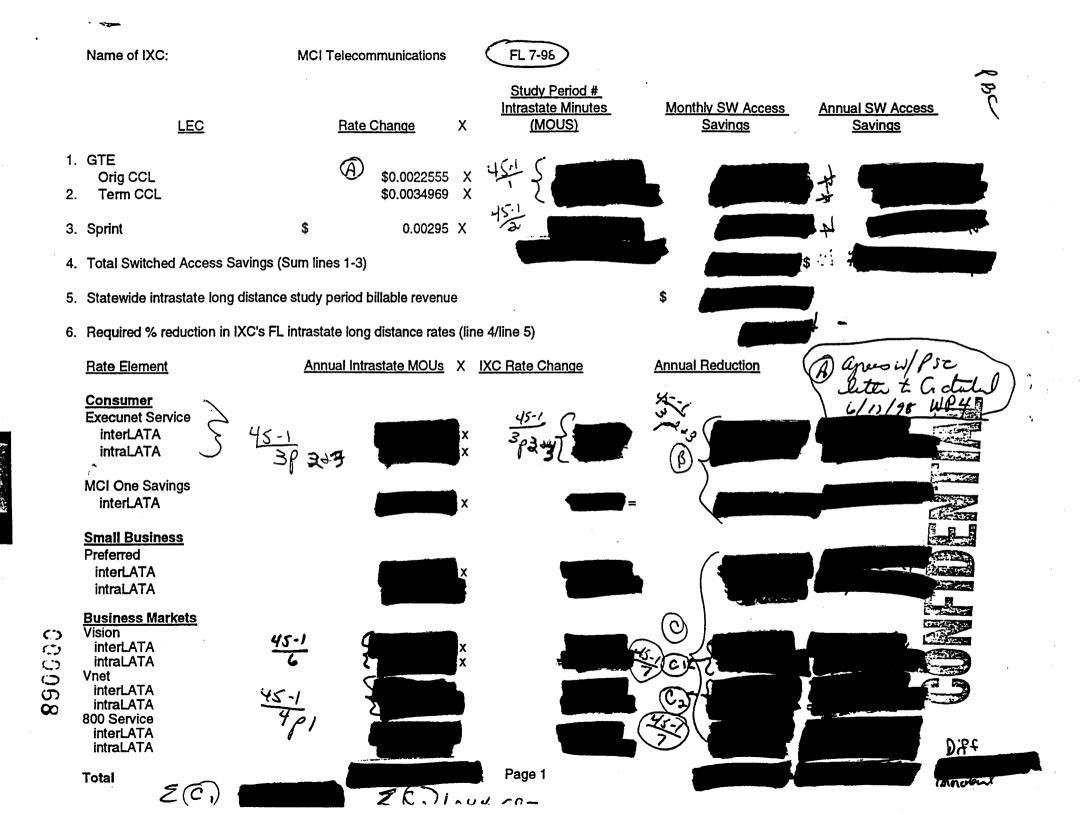
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CONFIDENTIAL 45p7

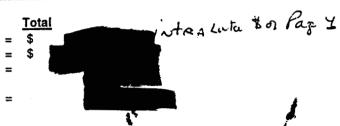
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Percentage Reduction of IntraLATA Toll Rates

2. LEC Percentage Switched Access Reduction (comes from IXC Flow-Through Worksheet, Line 6)

NOTE: Line 1c must be no greater than Line 2.



Determination of Residence & Business Calculation

Mass Markets - Residential & Small Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet . These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Business Markets - Business Services

Description of how dollars calculated (e.g., rate elements included, etc.)

For total intraLATA dollar reduction, see IXC Flow Through Worksheet . These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction

For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

Each business units' (i.e., Residential, Small Business, and Business Markets) portion of the total reduction is calculated on a pro rata pasis using the percentage of revenues for each business unit for the study period.

> **Business Markets** Small Business Residential Total Study Period Revenues

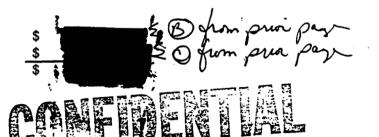




IXC Flow Through Sunimary

- 1. Annualized Effect* of Flow Through to Residential Rates 2
- 2. Annualized Effect* of Flow Through to Business Rates
- 3. Total Annualized Flow Through* (line 1 + line 2)

*see IXC Flow Through Worksheet



		A description of the second se	12	2	<u>*</u>	1,7
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GTE INTRASTATE ACCESS SERVICES

MCI RATE IMPACT ANALYSIS
FLORIDA - CCL REDUCTION

				Marin 900				
\	(7/1/98)		RATE	1	MONTHLY	MONTHLY		COST
` OLD	NEW	RATE	PERCENT	MONTHLY	COST AT	COST AT	COST	PERCENT
RATE	RATE	DIFFERENCE	VARIANCE	UNITS (*)	OLD RATES	NEW RATES	DIFFERENCE	VARIANCE

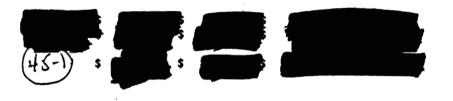
MCI IMPACT:

CCL - Originating: CCL - Terminating: \$0.02248420 \$0.02022870 \$(0.00225550) -10.0% \$0.03483420 \$0.03133730 \$(0.00349690) -10.0%

Total MCI Impact

* Based on 3/98 data.







Po / Pec (01 2)

8/25/99

5	2	<u>.</u> .	39 2							Spr	int
				MCESOUTHERNIFINANCIAL OPS INTRASTATE SWITCHED ACCESS MAY 1998 IMPACT ANALYSIS							@C
				FILING: FL-??? EFFECTIVE DATE: 7/1/98 STATE: FL	Man 98 actual	Current	New	Current	New		•
				Terminating Interconnection	Demand (45-)	Rates	Rates	Revenue	Revenue	<u>IMPACT</u>	CHANGE
			C	ANDREAT GOODG (GATONICC)	-E \$	L					(45-1)
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1-24	Cas							•			82/20/20/200 80/11/00
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julie 1. davis PBC Fecunit - Short Page 2

From:

Diahna Williams [Diahna.Williams@mci.com]

Sent:

Wednesday, August 19, 1998 6:05 PM

To:

Julie L. Davis

Cc:

Henry Lewis; Jean Dancy; Sandy Chandler; Frank M. Mancino; Elizabeth G. Frazier; Andrew

Graves; Leslie Kerr; Jennifer Soder; Lana Williams

Subject:

FLORIDA FLOW THROUGH version2.0

í

Importance:

High

Julie-

Thanks, for your patience on this.....

Mass Markets BA has completed the Florida Flow Through. Below is the calculation of the percentage intralata reduction, as you will see the "total" intralata reduction is MM would like to propose that BM make up the difference. Following, is the FL Flow Through cost support.

Henry--

MM would greatly appreciate it if you could make up the intralata .60% variance.

Call with questions.

Thanks.

Diahna

Percentage Reduction of IntraLATA Toll Rates

Consumer

*NOTE: Line 1c must be no greater than Line 2.

SB

BM

Total

1 IntraLATA Rate % Reduction

a.Total IntraLATA \$\$ Red.=

b.Total IntraLATA Rev.

c.Percent Reduction =

2 LEC Percentage Switched Access Reduction=

EXCEEDS REQUIREMENTS BY

.

COMPLETE COST SUPPORT

NOTE: ALL rates were revised to accomodate the INTRAlata state statue

SB - Preferred one Saneye

Intralata

current

Day

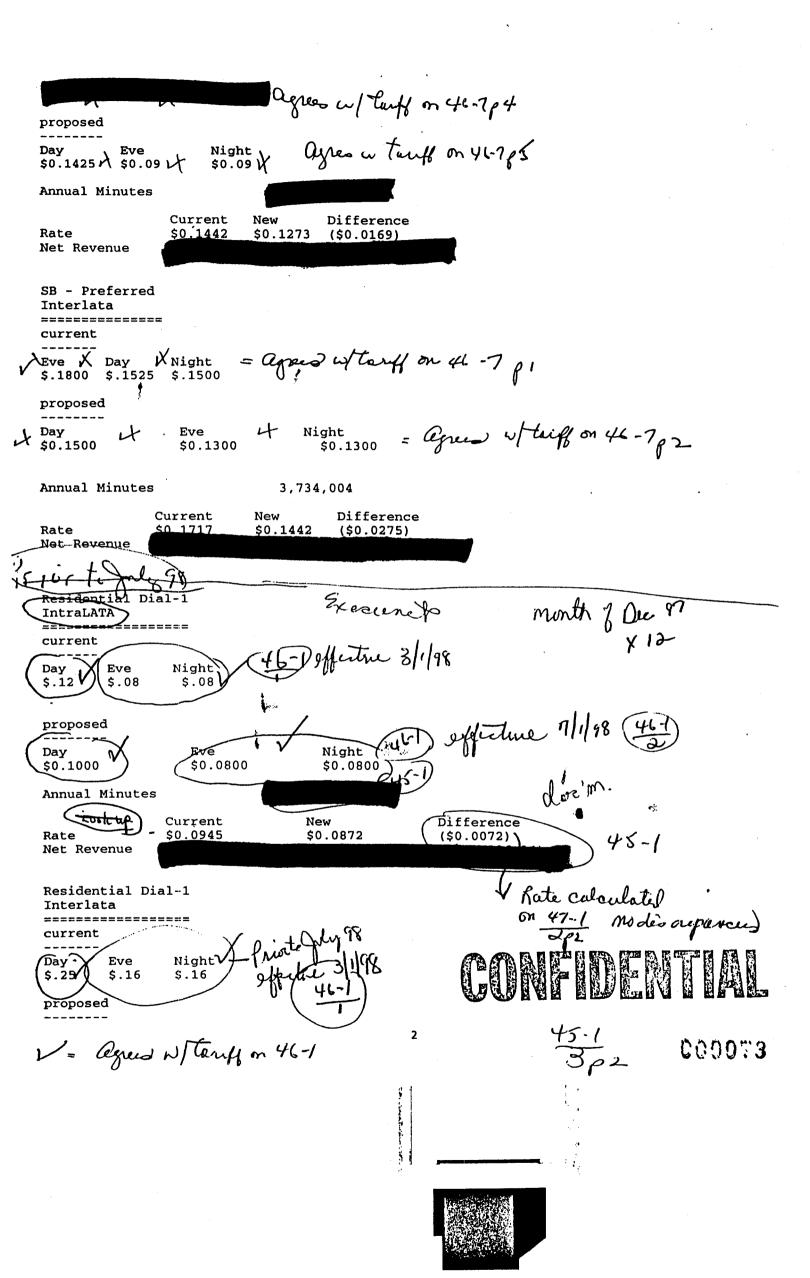
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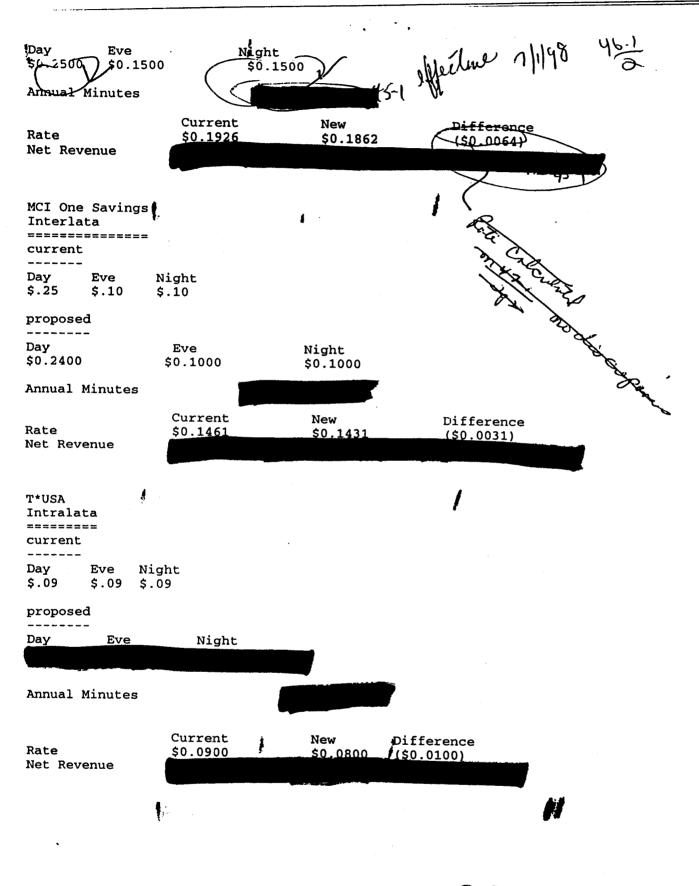
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COMPANY:

MCI WORLDCOM

DOCUMENTATION FOR ANNUAL INTRASTATE

MOU'S USED ON THE FLOW THRU WORK SHEET

PERIOD: DATE:

JULY 98 andOCT 98 **OCTOBER 27, 1999**

AUDITOR:

RKY

WP NO.

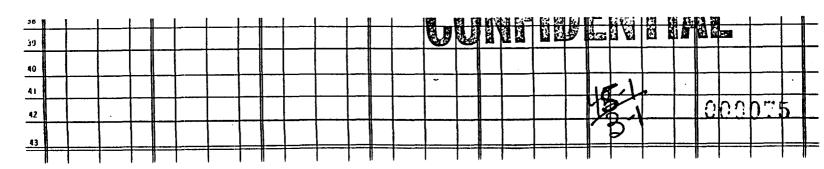
45-1/3-1

In answer to our request to determine how the company arrived at the annual MOU used in the flow thru work sheet, the company stated that for the July worksheet, the months of December 97 was used. The month was multiplied by 12 to come up with the annual.

We asked for documentation. The company said that the information is housed in their HUPCAP database. The data is not readily available, but they company provided Execunet data for 12 months end 6/99. This data showed:

Estimated Flow Thru 45-1 Actual Hubcap Worksheet data Data - 47-1/1 JULY 98 WORKSHEET Intralata 12 mos end Intralata 12 mos avg **Execunet** 06/01/99 December 97 **Total Minutes Total Minutes** Diff Interlata 12 mos end Intralata 12 mos avg December 97 06/01/99 **Total Minutes Total Minutes** MCI-One Savings Intrastate 12 mos Intrastate 12 mos end 6/1/99 avg December 97 **Total Minutes Total Minutes** Ref=45-1/3-2pg 3 Ref = 45-2**Execunet - OCT 98 WORSHEET** Intralata 12 mos end Intralata 12 mos avg 06/01/99 June 98 **Total Minutes** Total Minutes Interlata 12 mos end Interlata 12 mos avg 06/01/99 June 98 **Total Minutes Total Minutes** Intrastate 12 mos Intrastate 12 mos MCI ONE SAVINGS end 6/1/99 avg June 98 **Total Minutes** Total Minutes

45-1/3-2 for Oct 98 Actual based on 10/98 - 7/99 annualized.



hn,111/00 **COMPANY:** MCI WORLDCOM TITLE: MOU's - Estimated vs. Actual PERIOD: **JULY AND OCT 98** DATE: **OCTOBER 29, 1999 AUDITOR:** RKY **JULY 98** Annual Intrastate IXC Annual **Annual** Rate Elements MOU's Rate Change Reduction Reduct Diff **Execunet Service** InterLATA - Estimated InterLATA-Actual(2) Difference **Execunet Service** IntraLATA - Estimated IntraLATA-Actual(2) **Total Execunet Annual Reduction Difference** (Effect of lowering annual reduction dollar amount) Add in MCI One Advantage InterLATA - Actual IntraLATA-Actual Effect of adding in MCI One Advantage (Effect of increaseing annual reduction dollars amount) OCTOBER 98 Annual Intrastate IXC **Annual** Annual Rate Elements MOU's Rate Change Reduction **Reduct Diff Execunet Service** InterLATA - Estimated InterLATA-Annualized (1) Difference **Execunet Service** IntraLATA - Estimated IntraLATA-Annualized(1) 45. Total Execunet Annual Reduction Difference - Oct 98 (Effect of lowering annual reduction dollar amount) Add in MCI One Advantage InterLATA - Annualized(1) IntraLATA-Annualized (1) Effect of adding in MCI One Advantage (Effect of increaseing annual reduction dollars amount) (1)'10/98 to 7/99 Annualized to (2) n pe (2) 12 months end 6/1/99 R. (Original) 000076

7/98 FLORIDA FLOW THROUGH AUDIT

PER FLOW THROUGH WORKSHEET

Annual

Rate Element Intrastate MOU's X IXC Rate Change = Annual Reduction

Consumer

Execunet Service InterLATA IntraLATA

MCI One Savings InterLATA

Small Business Preferred

interLATA intraLATA









PER ACTUALS

Consumer

kecunet Service ---

interLATA intraLATA

interLATA

Small Business

intraLATA

MCI One Advantage ***

New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings
Mautes From Period 7/98-9/98 Shown Below, 10/98-Present Shown On 10/98 Audit)

interLATA (\$.10 flat)

\$ \$



TOTAL RATE REDUCTION

2000 CO.

10/98 FLORIDA FLOW THROUGH AUDIT

PER FLOW THROUGH WORKSHEET

Annual

Rate Element

Intrastate MOU's X IXC Rate Change = Annual Reduction

Consumer

Execupet Service InterLATA IntraLATA

MCI One Savings **InterLATA**

Small Business Preferred InterLATA

TOTAL RATE REDUCTION

PER ACTUALS 10/98-7/99

PER ACTUALS 10/98-7/99 ANNUALIZED

Consumer Execunet Service interLATA

IntraLATA

MCI One Savings Court Maria InterLATA

Small Business

Preferred interLATA

*** MCI One Advantage ***

(New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings)

interLATA (\$.10 flat) intraLATA (\$.05 flat)

TOTAL RATE REDUCTION





Consumer **Execunet Service**

interLATA intraLATA

MCI One Savings interLATA

Small Business Preferred interLATA

*** MCI One Advantage ***

(New Product Lauched 7/98 w/Lowest Instate Rates; Rate Change vs. MCI One Savings)

interLATA intraLATA

TOTAL RATE REDUCTION

fire state

FL98Audit4Julie.xls

8/24/99 3:57 PM

COMPANY: TITLE: PERIOD: DATE: **AUDITOR:**

MCI WORLDCOM

MOU's - Estimated vs. Actual

JULY AND OCT 98 OCTOBER 29, 1999

RKY

JULY 98

Annual Intrastate

Interexchange

Annual

Annual

Rate Elements

Minutes of Use

Carrier Rate Change Reduction Reduct Diff

Execunet Service InterLATA - Estimated InterLATA-Actual(2)

Difference

Execunet Service IntraLATA - Estimated IntraLATA-Actual(2)



Total Execunet Annual Reduction Difference (Effect of lowering annual reduction dollar amount)

OCTOBER 98

Annual Intrastate Minutes of Use

Interexchange

Carrier

Annuai

Annual Rate Change Reduction Reduct Diff

Execunet Service InterLATA - Estimated

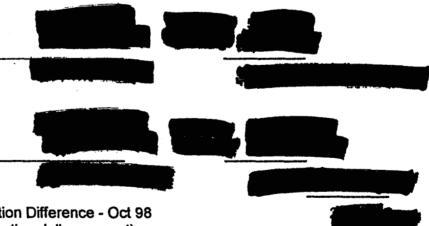
InterLATA-Annualized (1)



Difference

Rate Elements

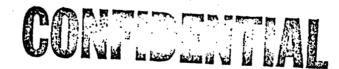
Execunet Service IntraLATA - Estimated IntraLATA-Annualized(1)



Total Execunet Annual Reduction Difference - Oct 98 (Effect of lowering annual reduction dollar amount)

- (1)'10/98 to 7/99 Annualized
- (2) 12 months end 6/1/99

FILE NAME "Compare"



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BBC

November 3, 1999

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

VIA FACSIMILE AND U.S. MAIL

RE:

7/1/98 and 10/1/98 Flow Through Audit

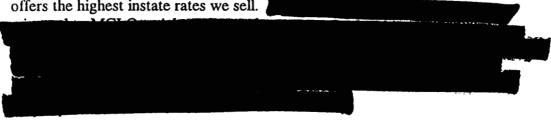
Dear Ms. Young:

This letter is in response to Data Requests 10 and 11 in the above referenced matter

Request Number 10 regarded the discrepancy in the minutes of use for Execuned reported on the Flow Thru Worksheet versus the "HUBCAP" report. This difference is due to the following:

The total minutes per the flow through worksheet were based on a 12-month projection using only the month of December 1997 traffic, while the HUBCAP data represents total actual minutes. The projection made at the time the flow through worksheet was prepared was based on traffic patterns at that time. Shifts in traffic patterns since the flow through worksheet was completed are represented within the actual minutes from the HUBCAP report.

Additionally, in mid-1998, the new MCI One Advantage product was launched which offers customers the lowest instate rates we sell. Execunet offers the highest instate rates we sell.



Finally, MCIWORLDCOM would like to stress that y

Br

MCIWORLDCOM flowed through what was expected.

CONFIDENTIAL



Letter to Ruth Young November 3, 1999 Page Two

Request Number 11 regarded the discrepancy between Staff's calculations of the October 1998 intraLATA Vision minutes of use and those reported on the flow through worksheet.

In MCIWORLDCOM's review of this request we found some additional errors. As a result, we are providing a new calculations for both the July and October Vision minutes.

On the July worksheet, MCIWORLDCOM reported a total of minutes for Vision interLATA and minutes for intraLATA. In recalculating these minutes, MCIWORLDCOM found errors in both the original calculations provided on the flow through worksheet and in Staff's calculations. As you can see in attachment A, the new interLATA minutes are find the intraLATA minutes are find the

The difference in Staff's calculations for the intraLATA minutes versus those reported on the flow through worksheet is due to the fact that the spreadsheet provided to Staff listed minutes for all services categories including those that did not experience a rate change. After subtracting out the minutes that did not include rate changes, MCIWORLDCOM's new calculations agree with those initially provided on the October flow through worksheet.

Requests 8 and 9 have been received and copies of the requested customers' invoices will be provided as soon as possible.

Please feel free to contact me with any additional concerns regarding this matter.

Sincere

Julie L. Davis

Regulatory Manager

Attachment

CONFIDENTIAL



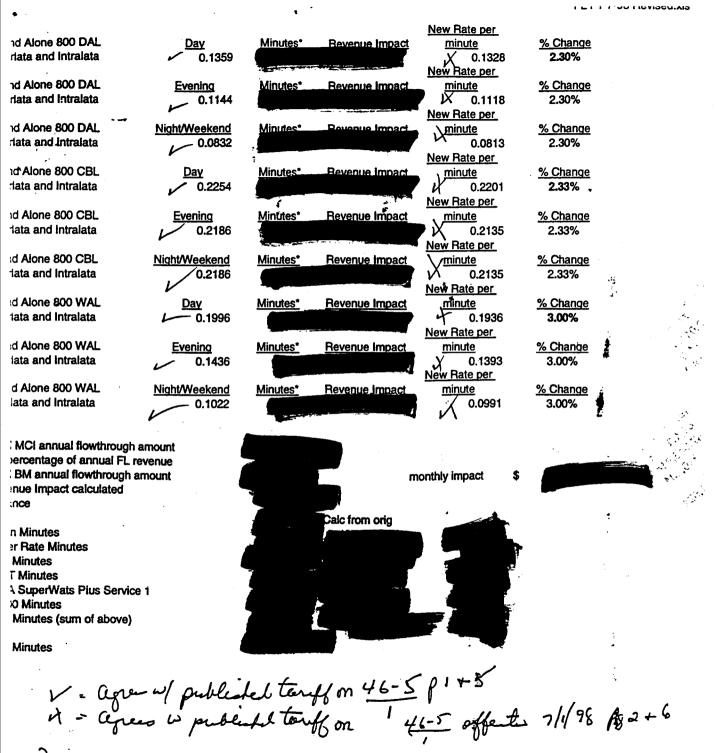
ATTACHMENT A

CONFIDENTIALS



11/00 11/10/69

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FL FT 7-98 Revised.xls FL FT 7-98

8/25/99 1:16 PM

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CBL

SA800

Interlata

INTRALATA

COMPANY:

MCI

TITLE:

NUMBER OF MINUTES FOR VNET - JULY 98 FLOW THRU

PERIOD:

ANNUAL (DETERMINE ANNUAL)

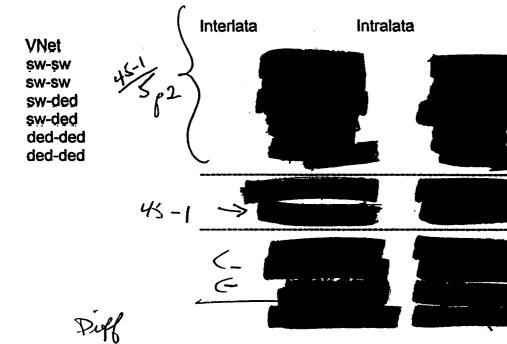
DATE:

SEPTEMBER 15, 1999 RKY

AUDITOR:

WP NO.

45-1/4



a review of to back upm 45-1 phones that

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8/25/99 1:16 PM

FL FT 7-98 Revised.xls FL FT 7-98

AUDITOR: on 45-8/5 Times 7 DATE:

RECALCULATION OF MCI WORLDCOM COMPANY: TITLE:

BLENDED RATES FOR VNET TARIFF JULY 1, 1998 and OCTOBER 1, 1998 PERIOD:

JANUARY 7, 2000

Februar (1) or A 45-1-5-1 Explanation of WP NO.

Staff recalculated the new rate per minute based on the tarif as filed with the Commission.

for Example

Interlata Peak

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0.1505

0.2151

Per company Doc;m

0.2154

The difference in the staff's calculation and the company's calculation appears to be rounding as when using the company's billing system printouts we can see that the company used the correct tariff. This is on WR 45-1/5-1/1. The rest of the calculations are or (WP 45-1/5-1/1

Also, when staff recalculated the sample bills on WP No. $\sqrt{7-\chi}$, we use o the bended rates on 45-1/5 and came up with the same amounts as billed to the customer

An example of how the different methods of calculating this bring about the same results that are billed to the customer is included on WP NO. 57-2/6 Page two.



FL FT 10-98.xds

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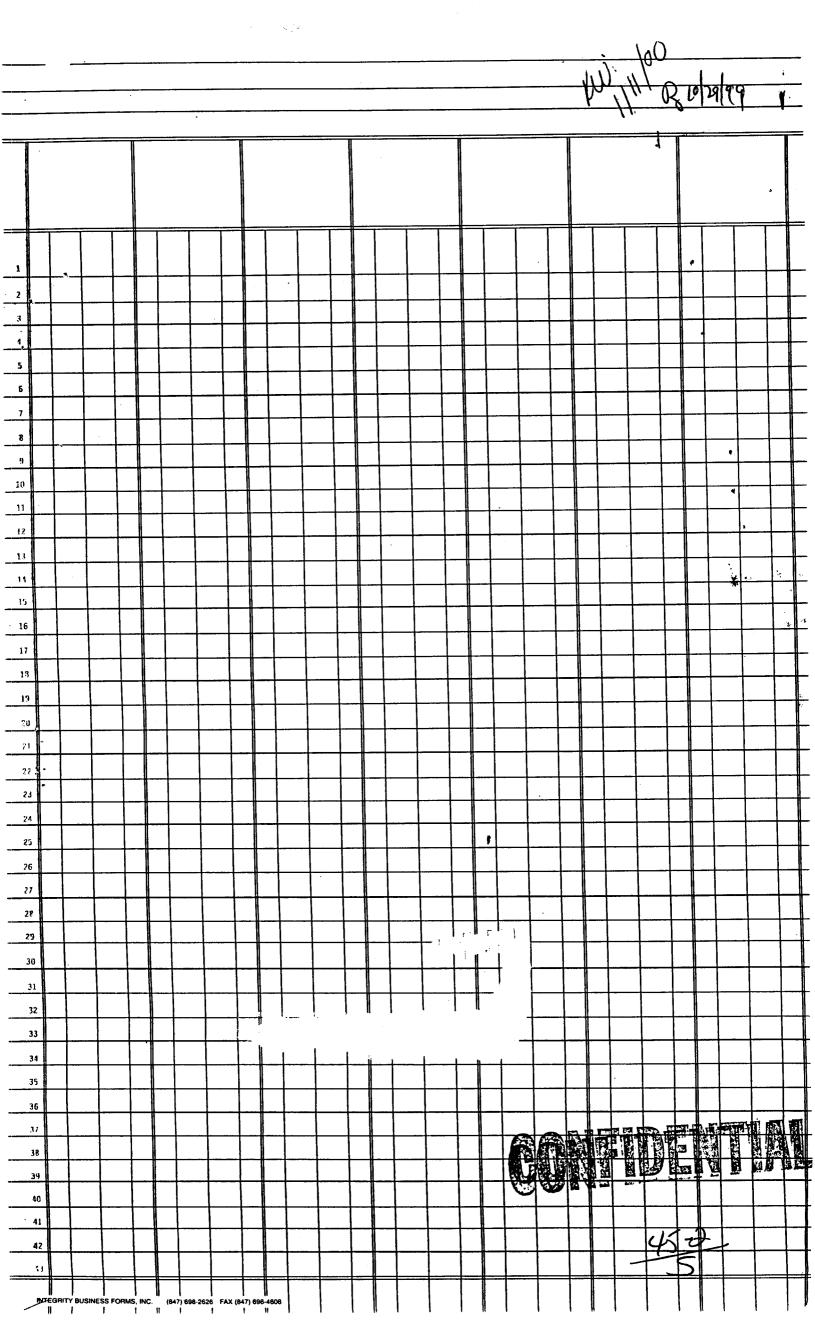
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JSA SuperWats Plus Service 1	<u> </u>							
A800 Minutes								
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V = agrees w/ published touff on 46-5 pg 3 + 7

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FL FT 10-98.xls FL FT 10-98



R 11/11/99

AUDIT DISCLOSURE 1

SUBJECT:

TARIFF CHANGES

STATEMENT OF FACTS: The company reduced the following rate elements on the Interexchange Carrier Flow Through Work Sheets for July 1, and October 1, 1998.

		July 1, 1998 Reduction	October 1, 1998 Reduction
Resider	ntail		
164 C	Execunet Service	Yes	Yes
44. {	Execunet Service MCI One Savings	Yes	Yes
Small E	Business		
46-7	Preferred	Yes	Yes
Busines	ss Marke (1)		
	Vision	Yes	Yes
	Vnet (91-25)	Yes	Yes
	800 Service	Yes	Yes
	networkMCI One	No	Yes

An analysis of the tariff changes subsequent to the October 1, 1998 tariffs shows that four of the rate elements were increased on January 28, 1998. They are Vision, Vnet, 800 Service and networkMCI One.

OPINION: A schedule detailing the reductions and increases is on the schedule attached to this disclosure. It appears that a majority of the elements were increased on January 28, 1999 to an amount equal to or higher than in effect before the first access charge reduction flow through.

ua pa-lo

CONTIDENT

4

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81100n

COMPANY: TITLE:

PERIOD: DATE: AUDITOR: MCIWORLDCOM ANALYSIS OF TARIFF CHANGES VISION FEBRUARY 1, 1998 THROUGH JANUARY 1, 1999

NOVEMBER 16, 1999 RKY

COMPANY: TITLE:

PERIOD:

DATE: AUDITOR:

MCIWORLDCOM ANALYSIS OF TARIFF CHANGES VISION FEBRUARY 1, 1998 THROUGH JANUARY 1, 1999 NOVEMBER 16, 1999

OPTION J (MCI VISION)

		InterLata)]		IntraLata]	
	CTU DELUGED OUBET OO 40 4 0	Switched Access	t	Dedicated Access	Vision Card 'Access	Switched Access	Dedicated Access	Vision Card Access
	5TH REVISED SHEET 26.18.1.2 February 1, 1998	0,18	381	0.1169	0.2186	0.1453	0.116	0.2186
,	6TH REVISED SHEET 26.18.12 July 1, 1998	0.18	35	0.114	0.2132	0.1421	0.1134	0.2138
	Reduction on July 1, 1998	-0.00	46	-0.0029	-0.0054	-0.0032	-0.0026	-0.0048
	7th REVISED SHEET 26.18.1.2 October 1, 1998	0.17	'82	0.1107	0.207	0.1421	0.1101	0.2138
	Reduction on October 1, 1998	-0.00	053	-0.0033	-0.0062	0	-0.0033	0
<u> </u>	8th REVISED SHEET 26.18.1.2 January 28, 1999	0.18	387	0.1172	0.2192	0.1505	0.1166	0.2264
•	Increase on January 28, 1999	0.01	105	0.0065	0.0122 '	0.0084	0.0065	0.0126

It appears that for this portion of the rate element the January 28, 1999 rate is higher than the rate before the IXC Access reduction.

MCI VISION POWER RATE PROGRAM

		InterLata	}	•	IntraLata)	
3.		in/Out Sw. Access	In/Out Ded Access	Power :	In/Out Sw. Access	In/Out Ded Access	Power Card
41-3	22 REVISED SHEET 26.18.0.2 February 1, 1998	0.1721	0.1042	0.1721	0.1296	0.1	0.1296
46-3	23rd REVISED SHEET 2618.0.2 July 1, 1998	0.1681	0.1018	0.1681	0.127	0.098	0.127
184	Reduction on July 1, 1998	-0.004	-0.0024	-0.004	-0.0026	-0.002	-0.0026
41.36	24th REVISED SHEET 26.18.0.2 October 1, 1998	0.1632	0.0988	0.1632	0.127	0.0952	0.127
16.	Reduction on October 1, 1998	-0.0049	-0.003	-0.0049	0	-0.0028	0
46-3	25th REVISED SHEET 26.18.0.2 January 28, 1999	0.1728	0.1046	0.1728	0.1345	0.1005	0.1345
168	Increse on January 28 ,1999	0.0096	0.0058	0.0096	0.0075	0.0053	0.0075

It appeares that all the elements in this part of the tariff that were reduced for the IXC access charge reduction were increased on January 28, 1999 to an amount higher than the February 1, 1998 tariff.

TITLE:

PERIOD: DATE: AUDITOR: MCI WORLDCOM

ANALYSIS OF TARIFF CHANGES

VNET

MAY 1, 1998 THROUGH JANUARY 28, 1999

NOVEMBER 17, 1999

	VNET	Interlata	Business Day	y Rates	j		
		Sw-Sw & Card	Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
•		First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec
4162	19th Revised Sheet 26.17 May 1, 1998	0.0662	0.0221	0.0451	0.0150	0.0174	0.0058
46.2	20th Revised Sheet 26.17 July 1, 1998	0.0646	0.0215	0.0439	0.0148	0.0174	0.0058
•	Reduction on July 1, 1998	-0.0016	-0.0006	-0.0012	-0.0004	0.0000	0.0000
41.2	21st Revised Sheet 26.17 October 1, 1998	0.0626	0.0209	0.0425	0.0142	0.0174	0.0058
	Reduction on October 1, 1998	-0.0020	-0.0006	-0.0014	-0.0004	0.0000	0.0000
41.2	, 22nd Revised Sheet 26.17 January 28, 1999	0.0663	0.0221	0.0450	0.0150	0.0183	0.0061
1.	Increase on Jan 28, 1999	0.0037	0.0012	0.0025	0.0008	0.0009	0.0003

Out of the six elements, it appears that five were increased January 28, 1999 to a higher rate in effect prior to the flow through of the access charge reduction.

	Intr	alata	Business Da	Rates	1		
	Sw-	-Sw &	Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
	Fire	st 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec
19th Revised Sheet 26.17 May 1, 1998		0.0516	0.0172	0.0454	0.0151	0.0174	0.0058
20th Revised Sheet 26.17 July 1, 1998		0.0505	0.0168	0.0444	0.0148	0.0174	0.0058
Reduction on July 1, 1998		-0.0011	-0.0004	-0.0010	-0.0003	0.0000	0.0000
21st Revised Sheet 26.17 October 1, 1998		0.0489	0.0163	0.0431	0.0144	0.0174	0.0058
Reduction on October 1, 1998		-0.0016	-0.0005	-0.0013	-0.0004	0.0000	0.0000
22nd Revised Sheet 26.17 January 28, 1999		0.0519	0.0173	0.0456	0.0152	0.0183	0.0061
Increase on Jan 28, 1999		0.0030	0.0010	0.0025	0.0008	0.0009	0.0003

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge Teduction flow through

TITLE:

PERIOD: DATE: AUDITOR:

MCI WORLDCOM ANALYSIS OF TARIFF CHANGES VNET MAY 1, 1998 THROUGH JANUARY 28, 1999 NOVEMBER 17, 1999

RKY

	VNET	interlata	Non Business]			
		Sw-Sw & Card	Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
		First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'l 6 Sec	First 18 Sec	Add 6 Sec
¥107	19th Revised Sheet 26.17.1 May 1, 1998	0.0582	0.0194	0.0353	0.0118	0.0124	0.0041
المنظمة	20th Revised Sheet 26.17.1 July 1, 1998	0.0568	0.0189	0.0345	0.0115	0.0123	0.0041
162	Reduction on July 1, 1998	-0.0014	-0.0005	-0.0008	-0.0003	-0.0001	0.0000
蜡	21th Revised Sheet 26.17.1 October 1, 1998	0.0550	0.0183	0.0335	0.0112	0.0123	0.0041
. /	Reduction on October 1, 1998	-0.0018	-0.0006	-0.0010	-0.0003	0.0000	0.0000
41.3	22nd Revised Sheet 26.17.1 January 28, 1999	0.0582	2 0.0194	0.0357	0.0119	0.0129	0.0043
.1.	increase on Jan 28, 1999	0.0032	0.0011	0.0022	0.0007	0.0006	0.0002

reductions. Four were increased on Jan 28, 1999 resulting in higher tariffs than were in effect prior to the flow through reduction. Out of the six elements, two were increased on Jan 28, 1999 to the same amount as the tariff prior to the two

		Intralata Non Business Day Rates					
		Sw-Sw & Card	Sw-Sw & Card	Sw-Ded Ded-Sw & Card	Sw-Ded Ded-Sw & Card	Ded-Ded	Ded-Ded
		First 18 Sec	Add'l 6 Sec	First 18 Sec	Add'i 6 Sec	First 18 Sec	Add'l 6 Sec
المناه	19th Revised Sheet 26.17.1 May 1, 1998	0.0470	0.0157	0.0356	0.0119	0.0124	0.0041
يديد	20th Revised Sheet 26.17.1 July 1, 1998	0.0461	0.0154	0.0349	0.0116	0.0123	0.0041
(\$>	Reduction on July 1, 1998	-0.0009	-0.0003	-0.0007	-0.0003	-0.0001	0.0000
41:2	21th Revised Sheet 26.17.1 October 1, 1998	0.0448	0.0149	0.0338	0.0113	0.0123	0.0041
116	Reduction on October 1, 1998	-0.0013	-0.0005	-0.0011	-0.0003	0.0000	0.0000
41-2	22nd Revised Sheet 26.17.1 January 28, 1999	0.0474	0.0158	0.0360	0.0120	0.0129	0.0043
7,94	Increase on Jan 28, 1999	0.0026	0.0009	0.0022	0.0007	0.0006	0.0002

It appears that all rate elements were increased on Jan 28, 1999 to an amount higher than the tariff in effect prior to the flow through of the access charge reduction.

46,04

TITLE:

PERIOD: DATE: AUDITOR: MCIWORLDCOM

ANALYSIS OF TARIFF CHANGES

800 SERVICE

OCTOBER1, 1997 THROUGH JANUARY 28, 1999 NOVEMBER 16, 1999

RKY

Option H (MCI 800 Service)

	Dedicated 7	Termination	Option	Switched W	/ATS Termin	ation
y-5	Business Day	Business Evening	Night & 'Weekend '	Business Day	Business Evening	Night & Weekend
14th Revised Sheet 26.15 October 1, 1997	0.1359	0.1144	0.0832	0.1996	0.1436	0.1022
15th Revised Sheet 26.15 July 1, 1998	0.1328	0.1118	0.0813	0.1936	0.1393	0.0990
Reduction on July 1, 1998	(0.0031) (0.0026	(0.0019)	(0.0060	(0.0043	(0.0032)
16th Revised Sheet 26.15 October 1, 1998	0.1228	0.1084	0.0789	0.1896	0.1364	0.0971
Reduction on October 1, 1998	(0.0100	(0.0034	(0.0024)	(0.0040) (0.0029) (0.0019)
17th Revised Sheet 26.15 January 28, 1999	0.1364	0.1148	0.0836	0.2008	0.1444	0.1028
Increase on January 28, 1999	0.0136	0.0064	0.0047	0.0112	0.0080	0.0057
	Business L	ine Termina	tion			

17th Revised Sheet 26.16 41-5	Business Day	Business Evening	Night & 'Weekend'
17th Revised Sheet 26.16 October 1, 1997	0.2254	0.2186	0.2186
18th Revised Sheet 26.16 July 1, 1998	0.2201	0.2135	0.2135
Reduction on July 1, 1998	(0.0053	(0.0051)	(0.0051)
19th Revised Sheet 26.16 October 1, 1998	0.2135	0.2071	0.2071
Reduction on October 1, 1998	(0.0066	(0.0064)	(0.0064)
20th Revised Sheet 26.16 January 28, 1999	0.2261	0.2193	0.2193
Increase on January 28, 1999	0.0126	0.0122	0.0122

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge reduction flow through.

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COMPANY: TITLE:

PERIOD:

MCIWORLDCOM ANALYSIS OF TARIFF CHANGES NETWORK MCI ONE OCTOBER 1, 1997 THROUGH JANUARY 28, 1999 NOVEMBER 16, 1999 RKY

DATE: AUDITOR:

NETWORKMCI ONE	1	_				
	Interlata	<u> </u>		Intralata		•
	Sw Orig or Terminating	Ded Orig or Terminating	One Card Access	Sw Orig or Terminating	Ded Orig or Terminating	One Card Access
2nd Revised Sheet 26.18.0.22.11			·			0.4077
October 1, 1997 46-6	0.1357	0.0798	0.1357	0.107	77 0.0798	0.1077
5th Revised Sheet 26.15.0.22.11						
October 1, 1998	0.1340	0.0798	0.1340	0.100	0.079	0.1064
Reduction on october 1, 1998	(0.0017	0.0000	(0.0017)	(0.001	0.0000	(0.0013)
6th Revised Sheet 26.18.0.22.11 January 28, 1999	0.1419	0.0836	0.1419	0.112	27 0.083	6 0.1127
Increase on January 28, 1999	0.007	9 0.003	0.0079	0.00	63 0.003	8 0.0063

It appears that all elements of this tariff were increased on January 28, 1999 to an amount higher than in effect before the access charge reduction flow through.

CONFEDENTIAL * Net 1" 46676

TITLE: PERIOD:

DATE: **AUDITOR:**

WP NO.

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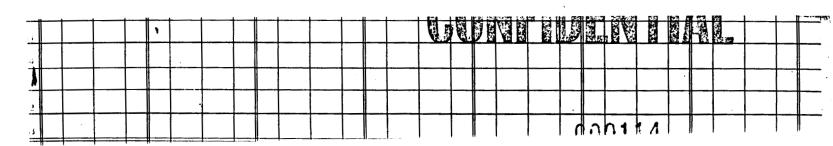
CALCULATION OF TARIFFS JULY 1 AND OCTOBER 1, 1998 **SEPTEMBER 15, 1999**

RKY

W/11/00

SERVICE*	RATES	DATE	DAY I	EVE I	NIGHT	WEIGHTED AVERAGE	
EXECUNET	INTRALATA	3/1/98 7/1/98	0.1200 0.1000	0.0800 0.0800	0.080.0		
`			}	DIFFERENC	E	- V	
		10/1/98	0.1000	0.0700	0.0700	, E	
				DIFFERENC	Œ		5
	INTERLATA	3/1/98 7/1/98	0.2500 0.2500	0.1600 0.1500	0.1600 0.1500	•	3,-
				DIFFERENCE	CE		/
		10/1/98	0.2500	0.1300	0.1300	ر می	3-/-\{\frac{1}{2}}
				DIFFERENC	CE	5	A.
MCI ONE SAV	INTERLATA	6/19/98 7/1/98	0.2500 0.2400		0.1000 0.1000		
				DIFFEREN	CE		\$ /
		10/1/98	0.2000	0.1000	0.100)	1
				DIFFEREN	CE		
		1/1/99	0.2000	0.1000	0.100	0	

CONFIDENTIAL 46-1



COMPANY: MCI TITLE: **CALCULATION OF TARIFFS** PERIOD: JULY 1 AND OCTOBER 1, 1998 DATE: **SEPTEMBER 15, 1999 AUDITOR:** RKY WP NO. WP46-2 EXAMPLE OF HOW DIFFERENCEIN RATES ARE CALCULATED FROM 45-1/5 AND 45-2/5 COMPANY **STAFF** WEIGHTED WEIGHTED **AVERAGE AVERAGE** SERVICE* **RATES** DATE 1ST 18 ADDTL 6 PEAK PEAK DIFFERENCE Note (A) **VNET SW-SW PLUS** CARD INTERLATA 5/1/98 0.0662 0.0221 0.2209 (1) 0.2209 0.0000 7/1/98 0.0646 0.0215 0.2154 (2) 0.2151 0.0003 0.0055 0.0058 (0.0003)TIMES MOU 10/1/98 0.0626 0.0209 0.2086 (3) 0.2089 (0.0003)7/1/98 LESS 10/1/98 0.0068 0.0062 0.0006 TIMES MOU -18 TES Transition . ÇT

TITLE:

PERIOD: DATE:

AUDITOR:

MCI

CALCULATION OF TARIFFS JULY 1 AND OCTOBER 1, 1998

SEPTEMBER 15, 1999

RKY

WP NO.

WP46-2

9	(1)	(2)	(3)	
<u> </u>	5/1 <i>/</i> 98	7/1 / 98	10/1/98	
ADDTL 6 TIMES	0.0221 7	0.0215 7	0.0209 7	*
PLUS 1ST 18	0.1547 0.0662	0.1505 0.0646	0.1463 0.0626	
•	0.2209	0.2151	0.2089	
STAFF CALCULATED CHANGE		0.0263	0.0288	
COPANY CALCULATION CHANGE		0.0250	0.0300	
DIFFERENCE IN CHANGE		0.0013	(0.0012)	

Need to reach full minute rule

17-13 7 x 6 Seconds-42 Seconds

+ 18 intil teents

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Resultantell

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: 7/1/98 and 10/1/98 Flow Through Audit

Dear Ms. Young:

Attached please find MCI WorldCom's responses to Requests 2-7 for MCI Telecommunications Corporation (MCI) in the above referenced matter.

2) Re: Study Period # Intrastate Minutes (MOUs)

For both July and Oct. 98 IXC flow thru worksheets, provide copy of bills from GTE and Sprint to back up the amount of study period MOUs.

MCI does not receive hard copies of invoices from GTE or Sprint. The bill data is sent electronically and is then loaded into a database for our Financial Operations Organization to access. Data is pulled from this database and is assimilated into the type of spreadsheet that was initially provided on August 25, 1999 as back up for the Sprint and GTE calculations shown on the worksheets.

- 3) Please answer the attached requests re: annual intrastate MOUs for 7/98 & 10/98
 - A. For Execunet service, how did you determine the annual MOU amounts on the IXC flow through worksheets? Provide documentation in addition to the memo previously provided. For example, from what accounting system were these MOUs obtained, provide copies of reports backing up the totals.

See Attachment A. The annual MOUs for Execunet service were determined by looking at one average month's worth of traffic and multiplying it by 12. For the July worksheet, the month of December 1997 was used and for the October worksheet, June 1998 was used. This information is housed in our HUBCAP database. This data is currently not readily available, but what has been provided is actual HUBCAP data for Execunet, MCI One Savings, and MCI One Advantage from 7/1/98 through 6/1/99.





Letter to Ms. Young September 29, 1999 Page Two

> В. The documentation provided for Business Markets for VNET in total does not agree with staff calculation. See attached Schedule A for 7-98 and B for 10-98. Please explain the differences. (45)

In Staff's calculations for both Schedule A and B, all components of Vnet service were included (i.e., Switched to Switched, Switched to Dedicated, and Dedicated to Dedicated). In MCI's calculations provided on both the July and October worksheets, the Dedicated to Dedicated MOUs were not included. This is due to the fact that no rate reductions occurred to this rate type.

C. For VNET, please explain how you came up with the annual minutes on the documentation provided. Provide explanation of how you determined the annual minutes and documentation from the company's records.

The MOUs for Vnet were calculated using the same method as stated in A. above. MCI is still in the process of pulling all the data to support both

worksheets for the Business Markets services. This information will be provided as soon as it is received. provided as soon as it is received

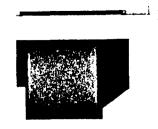
D. For Vision, please provide the % used for inter and intra lata so that we may determine the total minutes of use from the back up provided, as we discussed before.

For July 1998 the Vision intraLATA percentage is and 800 is October 1998 the intraLATA percentage is and 800

Also, for Vision, explain how you came up with the annual E. minutes on the documentation provided. Provide explanation of how you determined the annual minutes and documentation from the company's records.

See the answer to Cabove.

No dato available



Letter to Ms. Young September 29, 1999 Page Three

4. Please answer the attached requests re: weighted avg. peak rates.

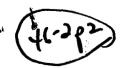
Staff recalculated the weighted average using the method discussed with you. For one VNET service, staff came up with different amounts than you did for the difference in tariff, for the dollar reduction amount and for the change in % of the tariff. See attached. We did not calculate the rest of VNET yet. Please let me know if there is a problem with your calculations or mine.

While I don't have access to the original files, errors of this nature are typically due to rounding problems in the spreadsheets used to calculate the rate reductions and impacts. One element may be carried out more or less decimal points than another element causing slight differences in calculations. As you can see, MCI's calculations are slightly lower than Staff's. This was the case in the majority of the figures I checked. The result of this is that MCI reduced other rates deeper in order to flow through the correct amount of dollars. So MCI concludes that no harm has been done to the customer and the total flow dollar amount has been reached.



In regards to you question concerning the calculation of the Vnet per minute rate, "7" is used in calculating this rate because these calls are billed in 18 second initial increments and 6 second additional increments. In order to reach a full minute rate, you must use 7 additional increments. See the formula below:

7 x 6 seconds = 42 seconds + 18 initial seconds



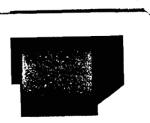
60 seconds

For "Execunet" service, provide calculation of how you determined the current and new blended rates from the actual tariff rates both current and proposed of 7/1/98 and 10/1/98 as attached on attachment "E."

Using the formula provided as Attachment B you can calculate the blended rates for Execunet service. The peak and off-peak percentages were determined by looking at the total intraLATA minutes of use and determining which are peak and which are off-peak.







Ve MEILE STAND S. Fo cui pro

Letter to Ms. Young September 29, 1999 Page Four

6. Re: Vision service tariff

I cannot locate the following tariffs in the information you provided. Please provide prior to 9/1 (fax received on 9/16). Provide 7/1/98, 10/1/98, and anything to the present – SW off-peak outbound, Ded off-peak outbound, SW off-peak inbound, and Ded off-peak inbound.

Sea (46-4)

There are no tariffed rate tables for the off-peak vision rates. This is tariffed as a discount in Section 4.1.10.4 "Time-of-Day Discounts" on Sheet 26.18.0.2.3 of MCI's tariff. A copy of this sheet is included as Attachment C.

7. Re: Vision Tariff

Per attached you provided the tariff for Vision card as .2132. According to the tariff 10/98 the tariff is .2138. See Attachment F

This is correct. I have provided an email (Attachment D) to indicate that MCI did recognize this fact and notified the business unit. The rate difference was minimal and did not change the overall dollar impact. Therefore, no new spreadsheet was sent to correct this error.

In addition, to the data provided herein, MCI is also in the process of gathering billing data for April 98 and May 99 as well as print outs of customer account data to allow Staff to select random bills for review. This information will take several more days to assimilate and will be provided as soon as it is received.

Should you require additional information in regards to this matter, please feel free to contact me at 800-759-3813.

Sincerely,

Julie L. Davis Begulatory Manager

Cc: Donna McNulty

Enclosures

coo120 CONFIDENTIAL

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RAC

ATTACHMENT A

CONFIDENCE

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7/98 - 6/99 Basic Dial-1 (Execur

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7/98 - 6/99 MCI One Savings

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ATTACHMENT B

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FL98Audit

9/16/99 3:50 PM

ATTACHMENT D

Determe how thes makes a diff

m-1 coc130



julie I. davis

From:

Henry Lewis [Henry.Lewis@mci.com] Tuesday, October 27, 1998 3:50 PM

Sent: ſo:

Lana Williams

Cc:

Julie L. Davis; Sandy Chandler Re: FW: FL Flow Through

Subject:

Lana:

Good catch! The IntraLata VISN Card current rate should be Inter- and Intra-Lata rates were the same prio to the last flow through when we had to adjust for FL's IntraLata percentage requirement.

We still wish to keep that rate unchanged flow through.

Thanks,

Henry

27 Oct 1998 15:33 -0500 (EST) From: Lana Williams < Lana. Williams GMCI. Com>

To: "Henry.Lewis" <Henry.Lewis@mci.com>
CC: "Julie L. Davis" <Julie.L.Davis@mci.com>

Sandy Chandler <Sandy.Peklo@MCI.Com>

Priority: normal

Subject: FW: FL Flow Through

Henry,

In the spread sheet you have Vision-Card intrLATA current rate as nould this be changed? however it is tariffed at

Lana.

Forwarded message:

Fri Oct 16, 1998 11:01 am EDT

----Original Message----

Henry Lewis [SMTP:Henry.Lewis@mci.com] From: Thursday, October 15, 1998 3:52 PM Sent:

To: Julie Davis

Re: FL Flow Through

Julie:

Attached is the FL Flow Through for BM. There is a tab (Rev Proj) that calculates our intralata percentage. When you insert the MM and SB #s it will also calculate for them and for companywide.

Henry

Wed, 14 Oct 1998 10:32 -0400 (EDT) Date: Julie Davis <Julie.L.Davis@mci.com> From:

Organization: MCI

To: 'Diahna Williams' <Diahna.Williams@mci.com>,

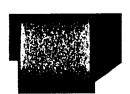
'Henry Lqwis' <Henry.Lewis@mci.com>

CC: 'Jean Dancy' <Jean.Dancy@mci.com>,

'Lana Williams' <lana.williams@mci.com>, 'Mike Boylan' <Michael.Boylan@mci.com>,

'Sandy Chandler' <Sandy.Peklo@mci.com>

Reply-To: "Julie.L.Davis@mci.com" <Julie.L.Davis@mci.com>



for this current

Subject: FL Flow Through

We don't have an approval on our request for extension yet, but I don't think we will have any problems. Please get me your information as soon as you can. I will let my Staff contact know that we are working on it. hanks, Julie

41

000132



PBC

January 10, 2000

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Follow Up To 1/10/00 Voice Mail Request

Dear Ms. Young:

In response to your voice mail request, enclosed please find the following information: signed and dated copy of Request No. 9 and one clean copy each of the 7/1/98 and 10/1/98 MCI flow through worksheets.

In response to your third request regarding the name of the database housing the information contained in the flow through spreadsheets for Business Markets, this information is no longer available. The flow through process has gone through numerous changes since the MCI WorldCom merger. The Business Market's employees who participated in the 7/1/98 or 10/1/98 flow through process are no longer with the company. In addition, the process used by Business Markets today is totally different from the 1998 process. I apologize for not being able to give you additional information on this subject, but should you need any additional clarification, please feel free to contact me.

The information provided in this package contains confidential information as defined in 364.183, 366.093, or 367.156 F.S.

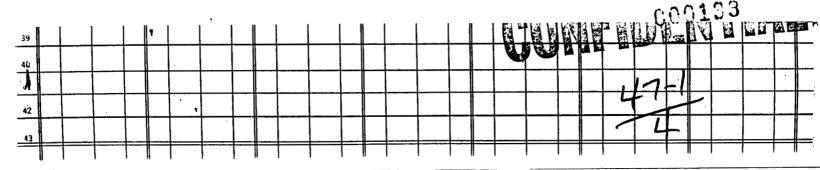
Sincerely,

Julie L. Davis

whi L. Dan

Enclosures

47-1



Company:

MCI Worldcom

Date::

January 7, 2000

Auditor:

rky

SUBJECT:

ESTIMATED ANNUAL DOLLAR REDUCTION TO CUSTOMERS FOR JULY

1, 1998 AND OCTOBER 1, 1998

STATEMENT OF FACTS:

On the July and October 1998 IXC Flow Through Worksheets, the company used a two steep calculation to determine the reduction to customers.

The first calculation is the rate change from the LEC times an estimated IXC study period Intrastate Minutes of Use. This results in a monthly and then annualized amount to be reduced on the IXC customers bills. The second part of the company's calculation is a detail of the rate elements the company intends to reduce to come up with the results in part one.

Staff recalculated the company's IXC Flowthrough Worksheets for July and Oct 98. There were no discrepancies except for rounding problems which are explained on WP no. 45-1/5 and 45-1/5-1.



0 COO134

MCI WORLDCOM

TITLE:

SELECTION OF SAMPLE

PERIOD:

APRIL 98 AND MAY 99

DATE:

OCTOBER 27, 1999

AUDITOR:

RKY

WP NO.

Staff selected two difference type of rate elements for the sample. One residential rate element and one business element.

51 Residential - EXECUNET

We obtained a list of customers at April 98 and at May 99. The list of April 98 included pages with a son each page for an approximate total of customers. From this staff selected an account on every pages to come up with a sample of However, when going to the May 99 list, we found that not all the accounts in April 98 were on the May 99 list. Therefore, before selecting the compared the April 98 with the May 99 to make sure we would get a comparison of the same accounts. I then selected one on each page or two on one page if there was none on the page.

There were bages on the May 99 list for a total of ustomers. It is reasonable to have some on one list and not on the second as the competition for LD phone customers is keen and people keep changing their plans.

The sample is on WP no. <u>ST-1</u>. Correlucion on <u>S1-1</u> pay 2

Business -- VNET PLAN

The company sent us a list of all business elements for Sept 98 and May 99. Staff selected V-Net plan to audit at random. The list was too large to count. Staff selected every 15 to 20 pages and then selected one account on the Sept 98 list that had the same number of the May 99 list so we can compare bills. 25 were selected. The sample is on WP No./

Conclusion on 512

CONFIDENTIAL 11

		KW, 111/00
Request No	ه سه	R 11/15/49
Re: Residential - Execunet		of .

The attached list includes 25 accounts from the April 98 Florida list without plan (execunet accounts). For each account provide the April 98 and May 99 invoices. Each number includes an alternative. For example, Page 1 includes sample number 1 and 1A. If 1 is not available, please provide the two months for the alternate (1A).

CONFIDENTIAL

This is the list plats gone to MCI. We received all sample invoices regrested. Results 1 the scenple test are on 57-1

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Page 3 of Sample

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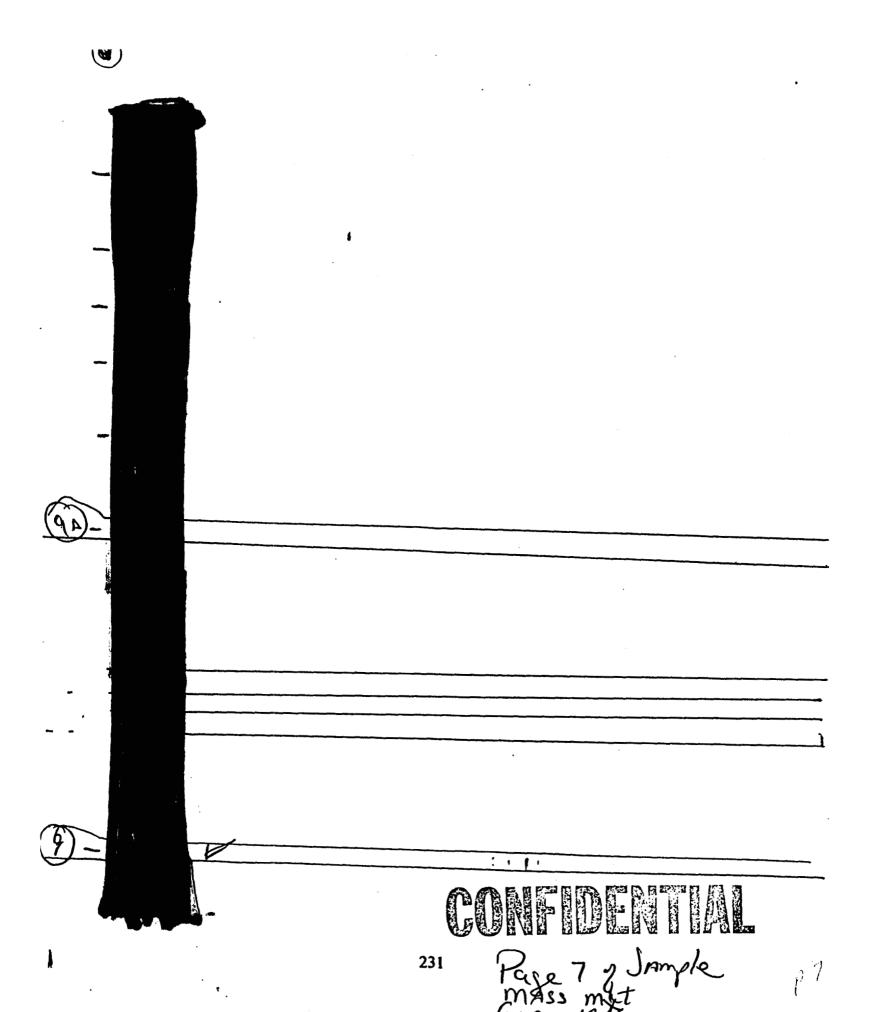
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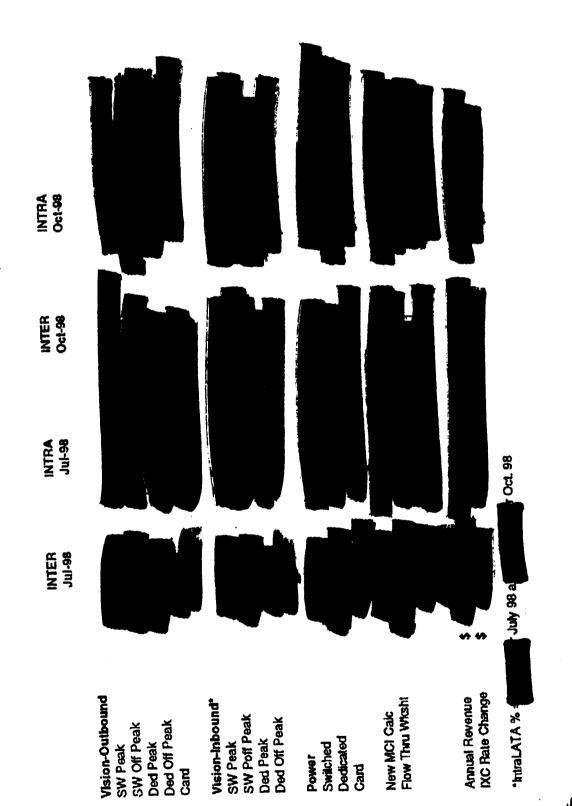
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Name of IXC: **MCI Telecommunications** Study Period: June, 1998 Study Period # Intrastate Monthly SW Access **Annual SW Access LEC** Rate Change Minutes (MOUS) X **Savings** Savings 1. GTE Orig CCL \$0.0042878 2. Term CCL \$0.0066423 X 3. Sprint 0.005554 X 4. Total Switched Access Savings (Sum lines 1-3) 5. Statewide intrastate long distance study period billable revenue 6. Required % reduction in IXC's FL intrastate long distance rates (line 4/line 5) Rate Element Annual Intrastate MOUs X IXC Rate Change **Annual Reduction** Consumer **Execunet Service** interLATA intraLATA MCI One Savings interLATA Small Business Preferred InterLATA Business Markets Vision interLATA ■ intraLATA interLATA intraLATA 00 Service interLATA intraLATA networkMCI One

000095

InterLATA intraLATA

Total:

	:	-		Name of IXC; MCI Telecommunications	
1	2	-	0	Effective Date of Flow Through: October 1, 1998	
\dagger	+	7		Percentage Reduction of IntraLATA Toll Rates	
	took	e de la companya de l		a. Total IntraLATA Dollar Reduction* b. Total IntraLATA Revenue* c. Percent Reduction (line a/line b) 1 1 5 C Percentage Switched Access Reduction	
	_	the	4	2. LEC Percentage Switched Access Reduction = (comes from IXC Flow-Through Worksheet, Line 6)	
	0		4	NOTE: Line 1c must be no greater than Line 2.	
	T 7	4	-	Determination of Residence & Business Calculation	
	Ž,		+	Mass Markets - Residential & Small Business Services Description of how dollars calculated (e.g., rate elements included, etc.)	
	2			For total intraLATA dollar reduction, see IXC Flow Through Worksheet . These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction	
	1-			For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.	
-	612	110	+	Business Markets - Business Services Description of how dollars calculated (e.g., rate elements included, etc.) For total intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction	
				For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.	
		6		Each business units' (i.e.,Residential, Small Business, and Business Markets) portion of the total reduction is calculated on a pro rata basis using the percentage of revenues for each business unit for the study period.	
4	+			Business Markets \$ Small Business \$	
+		UE TO		Residential \$ 100 miles 100	
1		E.		Total Study Period Revenues \$ 100.00%	
T		2		IXC Flow Through Summary	
‡	+		3	1. Annualized Effect* of Flow Through to Residential Rates = \$ \$ \$ \$ \$ \$ \$	
1			3	2. Annualized Effect* of Flow Through to Business Rates = \$ control of Flow Through* (line 1 + line 2) = \$ \$ control of Flow Through* (line 1 + line 2) = \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	
7	1	a de la constante de la consta	E	3. Total Annualized Flow Through* (line 1 + line 2) *see IXC Flow Through Worksheet	
+					
1	· P	12:3	-	Page 2	

81029/19

GTE INTRASTATE ACCESS SERVICES MCI RATE IMPACT ANALYSIS FLORIDA - CCL REDUCTION

PBC

(10/1/98) NEW RATE OLD RATE

RATE DIFFERENCE

RATE PERCENT VARIANCE

MONTHLY COST AT OLD RATES N MONTHLY UNITS (*)

MONTHLY COST COST COST NEW RATES DIFFERENCE VARIANCE

\$0.02022870 \$0.01594090 \$(0.00428780) \$0.03133730 \$0.02469500 \$(0.00664230)

-21.2%

Total MCI Impact/annual * Based on 7/98 bill cycle from date.

Total MCI Impact/monthly

CCL - Terminating: CCL - Originating:

MCI IMPACT:

CONFIDEN 10.000 M .

3			•	Sprint	
	MCESOUTHERNHINANCIAL OPS INTRASTATE SWITCHED ACCESS JUNE-AUGUST 1998 (AVG. DEMAND) IMPACT ANALYSIS			BBC	
·	FILING: FL-??? EFFECTIVE DATE: 10/1/98 STATE: FL				
	Terminating Interconnection	Current Rates .007066	New Current New Rates Revenue Revenue	IMPACT CHANGE	
000	MONTHLY COSTS (SAVINGS) IMPACT FROM EFFECTIVE DATE TO ANNUAL COSTS (SAVINGS)	O Y-E			·
8 10000 0000					
	15				00 (Sco/29/2
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From: Diahna Williams [Diahna.Williams@mci.com]
Sent: Wednesday, November 04, 1998 5:00 PM

Julie L. Davis

Andrew Graves; Lana Williams; M. Boylan; Denise Margraf

Florida Flow Through vs.3

High

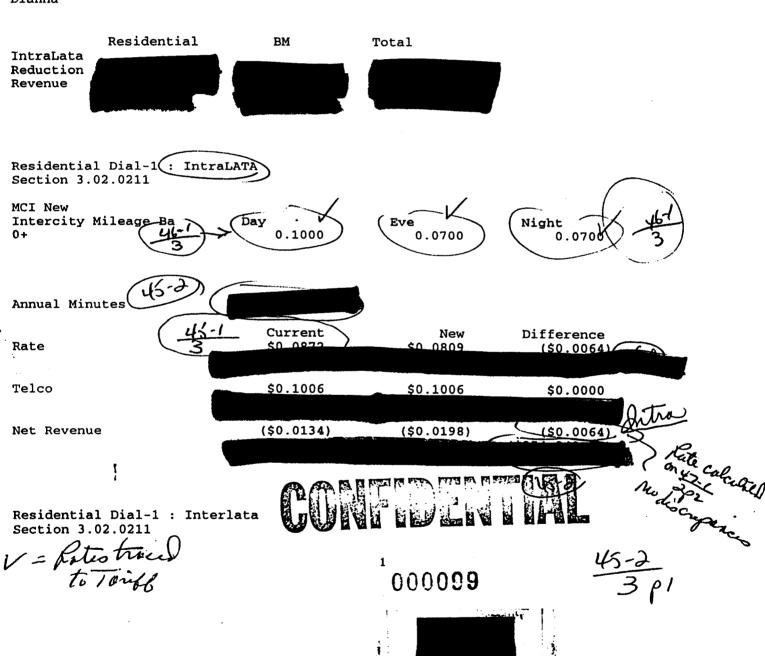
Julie-

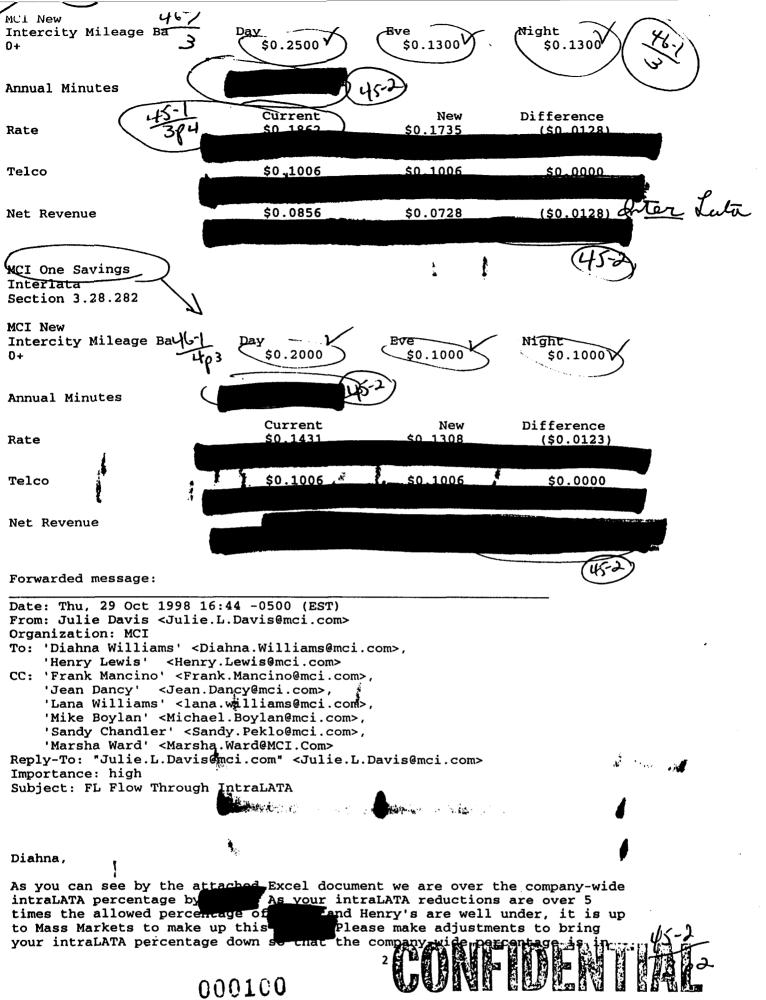
Here are the revised FL rates. Because of the Intralata constraints, MM has exceed the total flow through amount by the Intralata constraints, MM has chosen to implement this option because of various marketing/pricing strategies in the state of FL. We proposed that the sused as a credit towards a future Florida Flow Through.

For Premier Plan purposes, please ensure that the MCI One Savings changes are effective on the 1st of the Month.

Let me know when the Fl PUC gives approval.

Thanks, Diahna







compliance. We will need to file next week, so please get your new rates to me no later than Wednesday, 11/4.

Thanks, Julie

000101

Ţ

CONFIDENT 13/3



11/18/99 -THU 11:07 FAX 770 284 5533

MCI WORLDCOM REG AFFAIRS

Ø 002

julie I. davis

From:

Diahna Williams [Diahna.Williams@mci.com]

iont:

Tuesday, October 27, 1998 3:09 PM

-fo:

Julie L. Davis

Cc:

Sandy Chandler; Lana Williams

Subject:

10/1 FLORIDA FLOW THROUGH

Please ensure that these changes are effective on the 1st of the month because of Premier Plan changes.

thanks Diahna

Forwarded message:

Date: Tue, 27 Oct 1998 09:39 -0500 (EST)

From: Diahna Williams < Diahna Williams @mci.com>

Organization, MCI

To: Julie L. Davis <454-6069@mcimail.com> CC: Sandy Chandler <478-3648@mcimail.com>, Andrew Graves < Andrew. Graves @ mci.com>, Lana Williams <661-7046@mcimail.com>, Denise Margraf <215-3701@mcimail.com>, M. Boylan <219-0054@mcimail.com>

Priority: High

Subject: 10/1 FLORIDA FLOW THROUGH

Julie-

The 10/01/98 Florida Flow Through is completed. Please let me know when the FL PSC approves. Thanks - Diahna

SB - Preferred Section 3.12.1231

Interlata

Intercity Mileage Ba

All

\$0 1500

Eve N/W \$0.1140 \$0.1140

Cost Support

Annual Minutes

3,275,256

Day

Rate

Current New Difference \$0.1442 (\$0.0046)

Telco

\$0.1006 \$0.1006 \$0.0000

Net Revenue

\$0,0436 \$0.0389 (\$0.0046)

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COMPANY:

MCI

TITLE:

NUMBER OF MINUTES FOR VNET - oct 98 flow thru

Intralata

PERIOD:

ANNUAL (DETERMINE ANNUAL)

DATE:

SEPTEMBER 15, 1999

AUDITOR:

RKY

WP NO.

45-2/4

Interlata

VNet sw-sw SW-SW

sw-ded sw-ded ded-ded ded-ded

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CONFIDENTIAL

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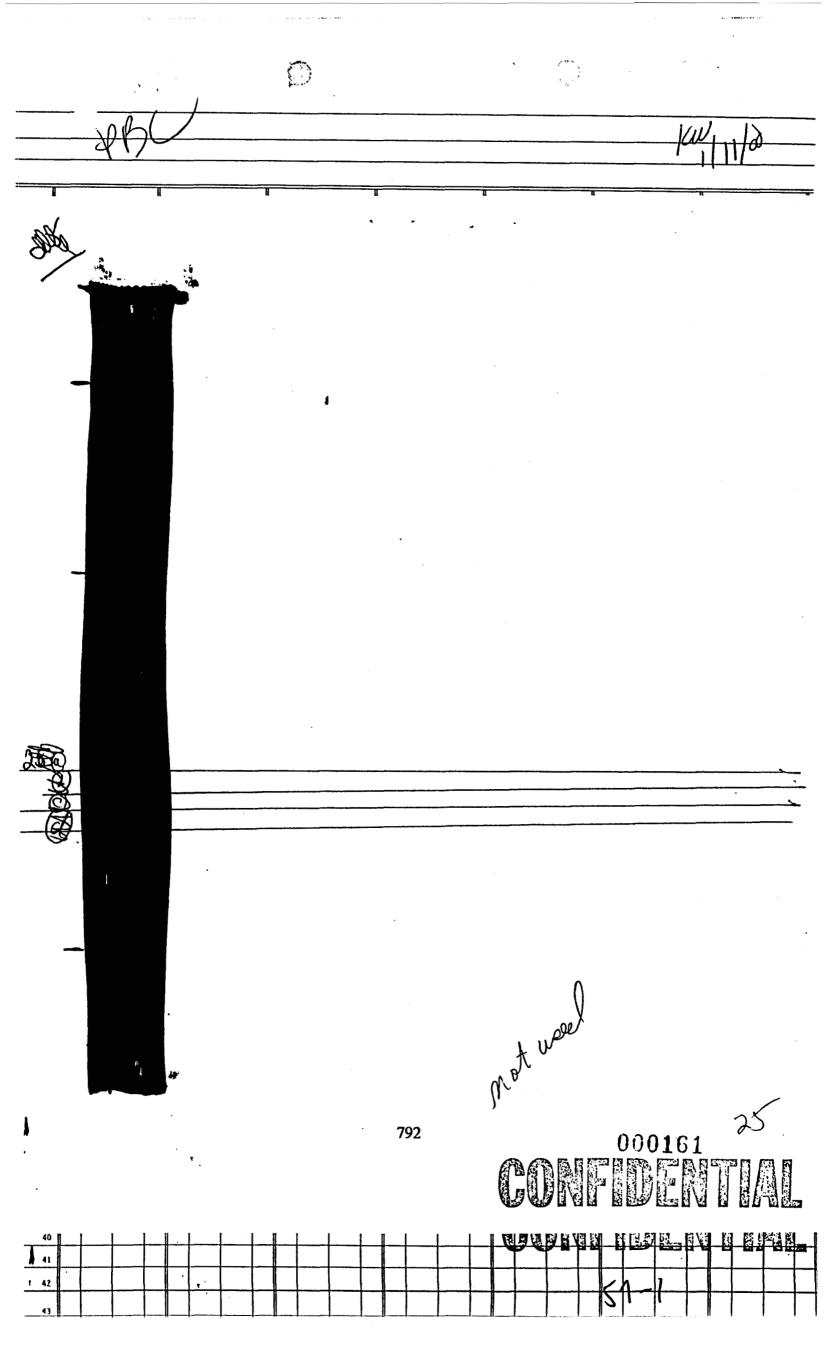
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COMPANY: TITLE:

MCI WORLDCOM

SAMPLE OF RESIDENTIAL RATE ELEMENT

EXECUNET

PERIOD:

INVOICES DATED APRIL 98 - TARIFF EFFECTIVE 3/1/98 INVOICES DATED MAY 99- TARIFF EFFECTIVE 10/1/98

DATE: NOVEMB ER 15, 1999

AUDITOR:

RKY

WP NO.

57-1/1

SOURCE: INVOICES DATED APRIL 98 AND MAY 99 FOR EXECUNET SERVICE TARIFFS DATED MARCH 1, 1998 AND OCTOBER 1, 1998 WP 46-1/1 and 6-1/3

Staff determined from the bills whether the calls were interlated or intralated day or night and then calculated the minutes times the tariffs that were supposed to be effective at that time.

Any discrepancies are noted in the footnotes.

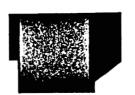
KEY = OK = Tariffs billed correctly

No FI to FI calls = no FI intrastate calls were made by the customer that month.

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	₹ <u>-</u> -),	APRIL 98	MAY 99	
SAMPLE NO. "	ACCOUNT NO. "	INVOICE "	INVOICE	
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57-1

000162 CONFIDENTIAL



COMPANY:

TITLE:

PERIOD:

MCI WORLDCOM
SAMPLE OF RESIDENTIAL RATE ELEMENT
EXECUNET
INVOICES DATED APRIL 98 - TARIFF EFFECTIVE 3/1/98
INVOICES DATED MAY 99- TARIFF EFFECTIVE 10/1/98

DATE: **NOVEMB ER 15, 1999**

AUDITOR:

RKY

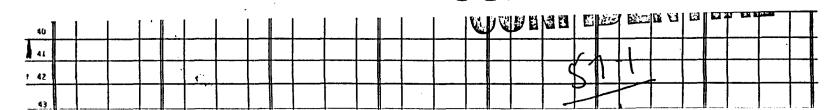
WP NO.

57-1/1

SOURCE: INVOICES DATED APRIL 98 AND MAY 99 FOR EXECUNET SERVICE TARIFFS DATED MARCH 1, 1998 AND OCTOBER 1, 1998 WP 46-1/1 and 6-1/3

FOOTNOTES

Date .	From	То		Peak/off peak	Minutes	Am	ount 1	Per Min
NOTE A - 57-1/2	>		· · · · · · · · · · · · · · · · · · ·					
Apr 3, 98		904	904	Peak		3	0.75	0.25
April 17, 98		904	904	Peak		3	0.75	0.25
Arp 24, 98		904	904	Peak		3	0.75	0.25
According to the ta	riff dated Mai	rch 1, 1998 (46-1/1)	the peak intra	lata tariff is .12cents	per minute			
NOTE B - 57-1/3)								
aPRIL 19, 98		352	352	Off Peak		1	0.16	0.16
According to the ta	riff dated Ma	rch 1, 1998 (46-1/1)	the off peak i	ntralata tariff is .08 ce	ents per minute	;		
NOTE C - 57-1/4	S							
May 10, 99		352	352	Peak		1	0.25	0.25
May 14,99		352	352	Off Peak		3	0.39	0.13
•								
According to the ta	riff dated Oct	tober 1, 1998 (46-1/ tober 1, 1998 (46-1/	3), the peak ir 3), the off pea	ntralata tariff is .10 cei ik intralata tariff is .07	nts. cents.			
According to the ta	riff dated Oct riff dated Oct	tober 1, 1998 (46-1/ tober 1, 1998 (46-1/	3), the peak ir 3), the off pea	ntralata tariff is .10 cer ik intralata tariff is .07	nts. cents.			
According to the ta	riff dated Oct	tober 1, 1998 (46-1/ tober 1, 1998 (46-1/ 407	3), the peak ir 3), the off pea 941	ntralata tariff is .10 cer ik intralata tariff is .07 Peak	cents.	21	3.54	0.168571
According to the ta According to the ta NOTE D - 57-1/5 MAR 12, 98	riff dated Oct	407	3), the off pea	k intralata tariff is .07	cents.	21	3.54	0.168571
According to the ta According to the ta NOTE D - 57-1/5 MAR 12, 98	riff dated Oct) urif dated Mar	407	3), the off pea	k intralata tariff is .07	cents.	21	3.54	0.168571



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	INTERNE R MONTH e world's nity. Non eamed up g content	ers and local local to si	ON SEND CASH.
	Figure 19 To September 19 To S	exclusively for Mcdistance customers based on use of log numbers. Call 1-888-YAHOO-MCI (1-888-924-6662) to today!	LY THE LOWER PORTION MCI Account: Balance Due: Indicate amount paid Please make check or more payable TO MCI. DO NOT
Statement Date April 28, 1998 Page 1 of 4	\$23.63 \$23.63 Cr \$.00 \$20.24	\$20.24	RETURN ONL
a: 1 800 462-4663	04/27/98		OW AND DETACH 28, 1998 2000 9, 1998 2000 update your reverse side.
MCI Account Telephone: 904 MCI Customer Service: 1 800 462-4	S TO B OF TO S	Total Amount Due	PLEASE FOLD BELOW AND DE Statement Date: April 28, 1998 Statement Due Date: May 19, 1998 Check here if moving and update you change of address on the reverse significant and applications.
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Return this form with your payment.

MAIL TO:

#BWNBMMR

75265054747 MCI RESIDENTIAL SERVICE - SE PO BOX 650547 DALLAS, TX 75265-0547 *21098117455*

ASTATULA FLT 34705-9617

402257 04111502040203079 981174550 00000318 00000449

MCI Account Telephone:

Statement Date April 21, 1998



MCI Customer Service: 1 800 462-4663 Page 2 of 3

When to pay your bill

Your payment must be received by the "DATE DUE" in order to be reflected on your pext invoice. If we don't receive payment for the charges on this statement by the "DATE DUE", your account will become past due and subject to a late payment charge as applicable in your state.

How to pay your bill

Mail your check and remittance stub in the return envelope or a standard envelope and return to:

MCI RESIDENTIAL SERVICE - SE PO BOX 650547
DALLAS, TX.75265-0547

orrespondence and Internet Access

Written Inquiries: MCI, P.O. Box 4600, Iowa City, 52244-4600

Internet Access to MCI: http://www.mci.com

"Countdown to Smalt Dialing" contains ten of the most important dialing tips that consumers must know when they pick up the phone. It includes cost-cutting hints, tools to fight phone scams and a handy cut-out Smart Dialing Guide. "Countdown" was just released by Call For Action, a Washington, DC-based consumer advocacy group and MCI. You can get your free copy by sending a self-addressed, stamped envelope to Call for Action, 5272 River Rd.,

Bethesda, MD 20816 or visit MCI's web site at http://www.mci.comyand search for Countdown.

Invoice Continues on Next Page

		ease provide the date you			· · .	•
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City		State Zi	p Move Date		_	
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Check h	ere if you want M	MCI as your carrier at th	is new number and sign	below.		
		I to transfer my MCI serv				
the New Pl	one Number listed	d above. I authorize MCI	to provide my residen	tial long		
distance.	and local toll se	ervice, if available, and	to notify my local p	none company		
of my choi	ce for the phone	number(s) listed above.	I understand that I can	an only have one		
primary ca	rrier for each of	f these services per tele	phone number, and my	local telephone		
company ma	y charge a small	fee for this or any othe	r change.			
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		Page 4 of 4	
Current Charges	\$1.24]
Long Distance	\$3.18		
Calls from 352			
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Apr 4 4:22p Hinesville, GA	Ofpk 1 .17 Ofpk 1 .17	Resolve See 57-1	
Apr 19 4:41p Wildwood FL	Ofpk 8 V 1.28 Interl N		
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Taxes and Surcharges	just 5 cen	d every Sunday for ats a minute!	
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Ofpk = Call prided at Off Page			
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MCI WorldCom Account: Telephone:



Statement Date May 21, 1999

MCIWORLDCOM.

Customer Service: 1 800 444-3333

Page 1 of 4

S	ummary	of C	narzes
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Current Charges

Total Amount Due..... \$3.69

Payment Due Date....

REMINDER: A 1.50% late payment charge will apply to any unpaid balance as of June 20, 1999

PLEASE FOLD BELOW AND DETACH. RETURN ONLY THE LOWER PORTION

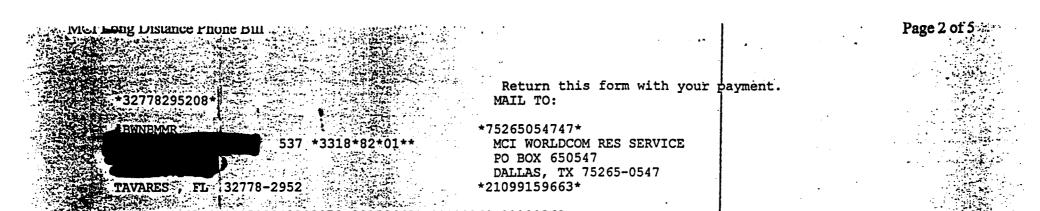
Statement Date: May 21, 1999
Payment Due Date: June 11, 1999

MCI WorldCom Account:
Balance Due:

Check here if moving and update your change of address on the reverse side.

Indicate amount paid L

Please make check or money brder PAYABLE TO MCI WORLDCOM. DO NOT SEND CASH.



21099159663

402257 0:111502040203079 991596631 00000369 00000369

MCI WorldCom Account: Telephone:

Statement Date May 21, 1999

MCI WORLDCOM

Customer Service: 1 800 444-3333

When to pay your bill Late Payment Fee

Your payment must be received by the "PAYMENT DUE DATE" in order to be reflected on your Please note that your ac next invoice. If we don't receive payment for the charges on this statement by the "PAYMENT charge if your payme" DUE DATE your account will become past due and subject to a late payment charge as given in the Reminder notice applicable in your state. Page 1. The charge is calculated at 1.50% of any unpaid from the previous month's invoice.

How to pay your bill

Mail your check and remittance stub in the return envelope or a standard envelope and return to: MCI WORLDCOM RES SERVICE

PO'BOX 650547 DALLAS, TX 75265-0547

Correspondence and Internet Access

Written Inquiries: MCI WorldCom, P.O. Box 4600, Iowa City, IA 52244-4600

Online Account Manager from MCI WorldCom: www.mci.com/service

Your account at your fingertips!

Online Account Manager from MCI WorldCom(sm) is the easiest, most convenient way to manage your account, 24 hours a day, 7 days a week! Review your current and prior invoices

Update your personal and account information

		\$3.33		**	
		•			
	Taxes and Surcharges	\$.36		and improved	
				t Manager from	
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	Calls from 352				
	Date Time Place Number Rate Min	Amount			
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	Apr 20 9:48p Hinesville, GA	.52	,	. •	
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	May 1 12:36p Tarpon Spg, FL Ofpk 3 May 10 6:36p Wildwood, FL Peak 1	.25	All your Sund	av	-t · · · · · · · · · · · · · · · · · · ·
	May 10 6:36p Wildwood, FL Peak 1	X .25_1	, , ,	e calls are only 5	This is bulled
	May 14 10:25a Tarpon Spg, FL Peak 1	.25	cents a minute	e. So go ahead	@ Inter!
	May 14 10:20p Belleview, FL Ofpk 7 3		N and call some	one special this	
	May 18 9:45p Tampa FL	.39		ery Sunday for	1.1
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	•	Page 5 of 5	
MCI WorldCom Account: Telephone: 352 May 21, 199	ate		
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Customer Service: 1 800 444-3333 Page 4 of 4	MCIWORLDCOM		
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Key to Rate Codes:			
Ofpk = Call priced at Off Peak rate Peak = Call priced at Peak rate			
reaks = Call priced at Peak rate			
For Your Information			
Call 1-800-410-8707 to find out how you can save time with alternative payment options. It's convenient, secure, and	MCI WorldCom 's Very easy to setup!		
Take a look at any enclosed special value offers just for	MCI WorldCom		
	End of T		
	End of Invoice. Thank You for Choosing MCI WorldCom.		

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MCL long distance phone bill

Account No. : Page No. Invoice No. : Page No. Billing Period: Mar 11-Apr 10, 1998

INQUIRIES ONLY, Write to: MCI P.O. Box 4600, Iowa City, IA. 52244-4600





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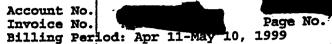
FL 32746-0000

Telephone No. (407)

MC	long distance phone bill	Account No. Invoice No. Billing Per	lod: Mar 11-Apr 10,	Page No. 2
	Invoice Date: 04/11/98 Current Charges (See Service Summary) Current Taxes and Surcharges Total Current Charges Taxes and Surcharges	•••••	\$33.66 \$3.92 \$37.58	
	Service Summary Long Distance Other Fees Total Current Charges Taxes and Surcharges	•••••	\$32.59 \$1.07 \$33.66	0
	Federal Excise Tax State & Local Taxes Federal; State & Local Surcharges Total Current Taxes and Surcharges Long Distance	••••	\$1.04 \$1.98 \$.90 \$3.92	
	Calls from 407 DATE TIME RATE TO/FROM NUMBER Mar 12 06:58P D TO FORT MYERS FL	MIN	AMOUNT 3.54 TITEAL.	D . 2 . 6
	15% 10:21A TO DIR ASST FL 15% 10:22A N TO MOUNT DORA FL 15% 10:24A N TO MOUNT DORA FL 15% 10:27A N TO MOUNT DORA FL	1 7 2 2 2 32 1 30	1.10 1.12 Interl 1 .32 V 5.12 Interl 1 .16 V 5.39 V 7.52 Interl 1	
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Invoice Date: 05/11/99	
Current Charges (See Service Summary) Current Taxes and Surcharges	\$17.23 \$1.76
Total Current Charges, Taxes and Surcharges	\$18.99
Long Distance	\$15.72 \$1.51
Total Current Charges	\$17.23
Federal Excise Tax State & Local Taxes Federal, State & Local Surcharges	\$.53 \$.74 \$.49
Total Current Taxes and Surcharges	\$1.76
Online Account Manager	
Visit the new and improved Online Account Manager from MCI WorldCom, the easiest, most convenient way to manage your account online. See your statement online at	
www.mcl.com/service! Long Distance	
Calls from 407- DATE TIME RATE TO/FROM NUMBER MIN	AMOUNT
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December 17, 1999

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Letter of December 10, 1999 concerning IXC Flow Through Worksheet Audits of MCI WorldCom and WorldCom Technologies

Dear Ms. Young:

Per the above mentioned letter the following responses are being provided.

MCI WorldCom

1. Answer to request No. 13.

Note A - Account

The calls in question on April 3, 17, and 24 were listed on the customer's invoice as being 3 minutes in duration and billed at \$.75. Your notes indicate these calls are intraLATA and should have been billed at \$.12 per minute resulting in a charge of \$.36. Our research indicates that all three calls are interLATA and were therefore billed correctly at \$.75 each. The April 3 and April 24 calls originated from [LATA 456] and terminated at 9 [LATA 452] (see Exhibit A). The April 17 call originated from 904-503 [LATA 456] and terminated at 904-277 [LATA 452] (see Exhibit B).

Notes B and C - Account

The calls in question are:

April 19, 1998 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; May 10, 1999 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; and May 14, 1999 a 3 minute call from 352-978 [LATA 454] to 352-307 [LATA 454]. According to the customer's invoice these are interLATA calls. As you can see in Exhibit C, my initial research agrees with your note indicating these are intraLATA calls. However, also included in Exhibit C is an email containing a print screen.

However, also included in Exhibit C is an email containing a print screen from OCIS [On-line Customer Information Service]. This screen indicates



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Letter to Ms. Young December 17, 1999 Page 2

that this ANI is cellular. Cellular service is not regulated and cellular rates are not required to be tariffed.

Note D and E - Account

The calls in question are a 21 minute call which originated at 6:58 p.m. on March 12, 1998 and billed \$3.54 and a 12 minute call which originated at 6:55 pm on April 26, 1999 and billed \$2.16. These calls are designated as "Day" [i.e., Peak] calls on the invoice. This designation is determined from the origination time of the call. However, the day period ends at 7:00 pm. In cases such as this when a call crosses time of day boundaries, the call is rated by designating the appropriate per minute rate to those minutes falling into the peak and off-peak categories respectively. To illustrate I have outlined the calculations for the two calls in question below.

March 12, 1998 call

$$6:58 - 6:59 = 2$$
 minutes x $$.25 = $.50$
 $7:00 - 7:18 = 19$ minutes x $$.16 = 3.04
Total call = 21 minutes = $$3.54$



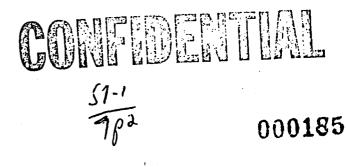
April 26, 1999 call

57-1

In addition, Exhibit D indicates that these calls were properly charged the interLATA usage rates

- 2. Answer to Request No. 14
 - 1. Account No.

I have relayed this information to our billing audit group and should have a response by December 23, 1999.





Letter to Ms. Young December 17, 1999

card charges. I have relayed this information to our billing audit group and should have a response by December 23, 1999.

9. Account

10/98 - invoice included as Exhibit G

12/98 - I have relayed this information to our billing audit group and should have a response by December 23, 1999.

10. Account

These invoices were not included in the original package as they have no Florida usage for the months of October and December.

WorldCom Technologies

1. Request No. 11

The World One invoices are being shipped via overnight mail from Chris Pace in Clinton, MS. You should receive these on 12/20/99.

2. Requests 10 and 12

This information will be provided the week of 12/20/99. I would like to arrange a conference call with our internal subject matter experts to go over this information and answer any questions you may have. Please contact me with your schedule.

3. Classic

See Exhibit H

The information in Exhibits E through H contains some confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom appreciates your handling this matter as confidential.

Please feel free to contact me with any questions or concerns regarding this information.

Sincerely.

Julie L. Davis

Regulatory Manager

57-1



16411/10

Letter to Ms. Young December 17, 1999 Page 2

2. Account

These calls are Dedicated Access origination and Switched Access termination. See Exhibit E for explanation.

3. Account

I have relayed this information to our billing audit group and should have a response by December 23, 1999.

4. Account

The \$.40 charge is a surcharge that applies to all Vnet card calls. This is tariffed in section 4.1.9.2.1 of the Florida tariff. This section is a subset of section 4.1.9.2 Rates and Charges and is not subject to time of day.

5. Account

I have relayed this information to our billing audit group and should have a response by December 23, 1999.

6. Account

10/98 – I have relayed this information to our billing audit group and should have a response by December 23, 1999.

12/98 - See Exhibit F. These calls are identified as cellular calls on the invoice. Cellular service is not a regulated service and therefore per minute rates are not required to be tariffed.

7. Account

Same as No. 2 above.

8. Account

The Dial One access portion of these bills is accurate. The \$.40 is applicable as described in No. 4 above. For the calculation of the

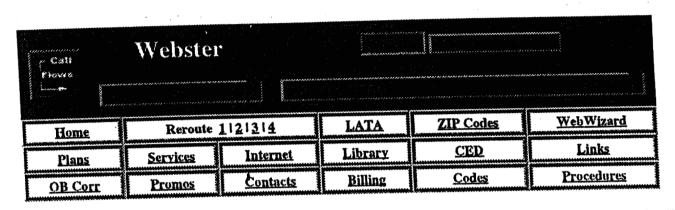
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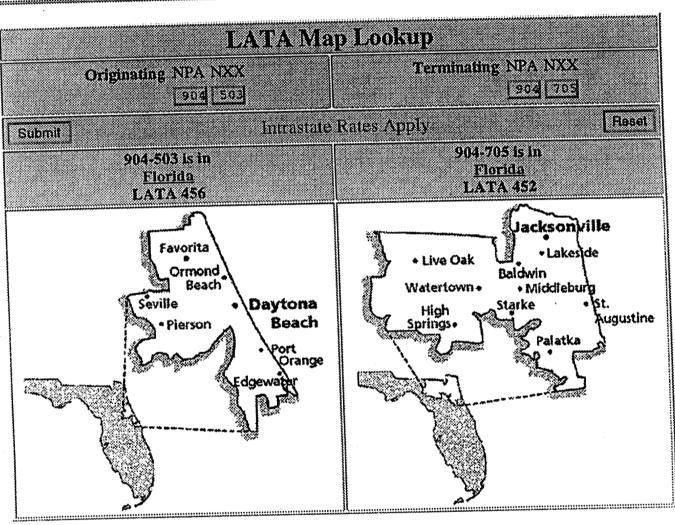
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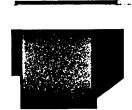
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ATTACHMENT B

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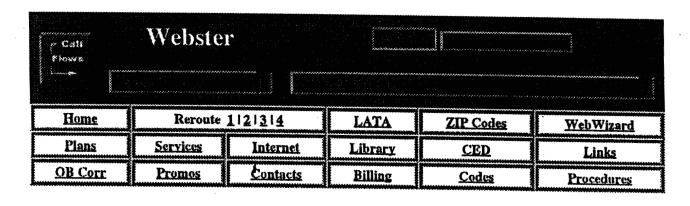
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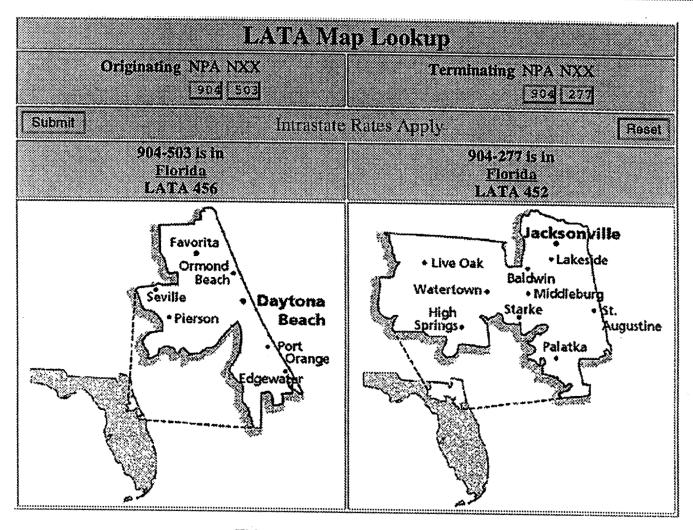


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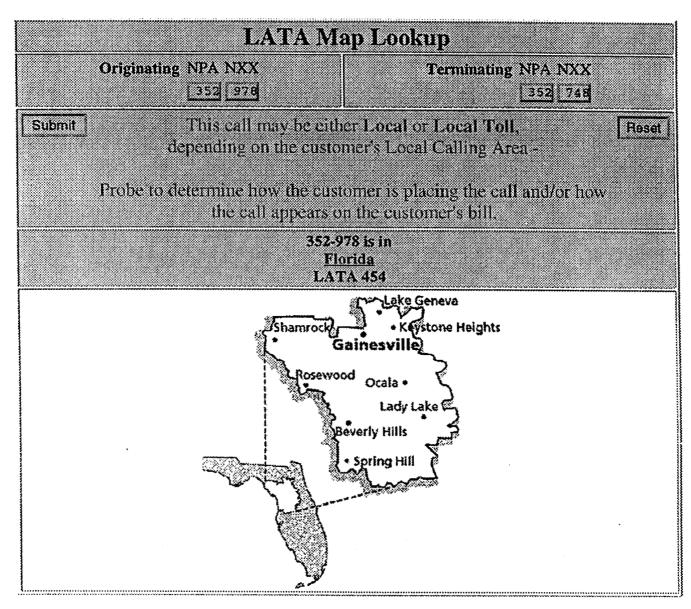
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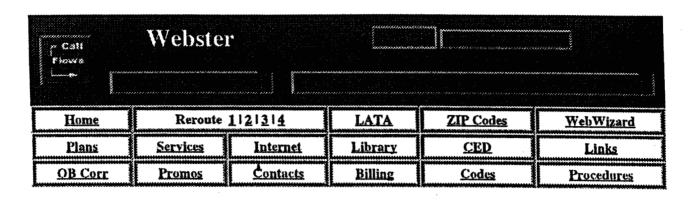
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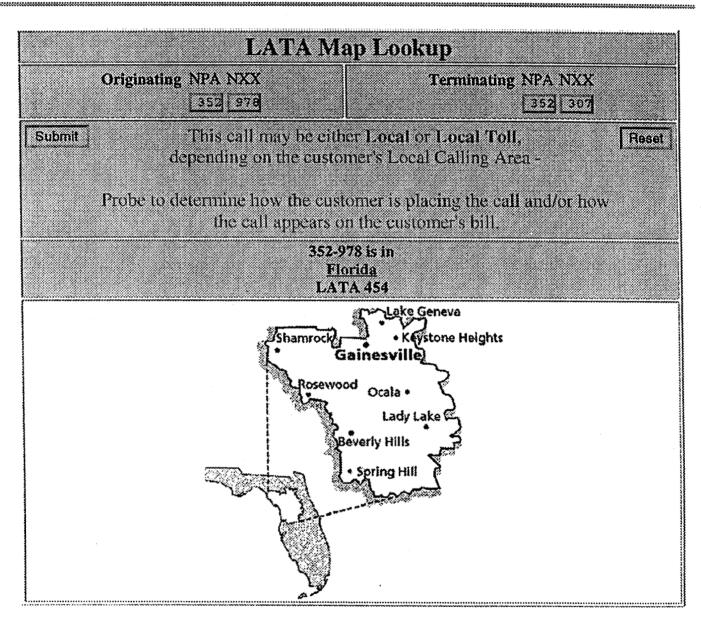
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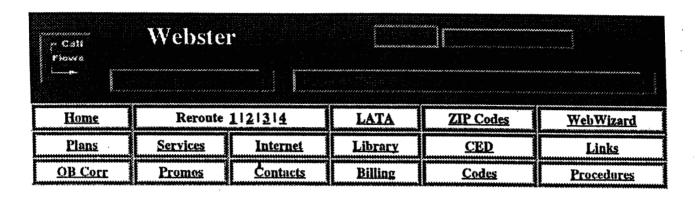


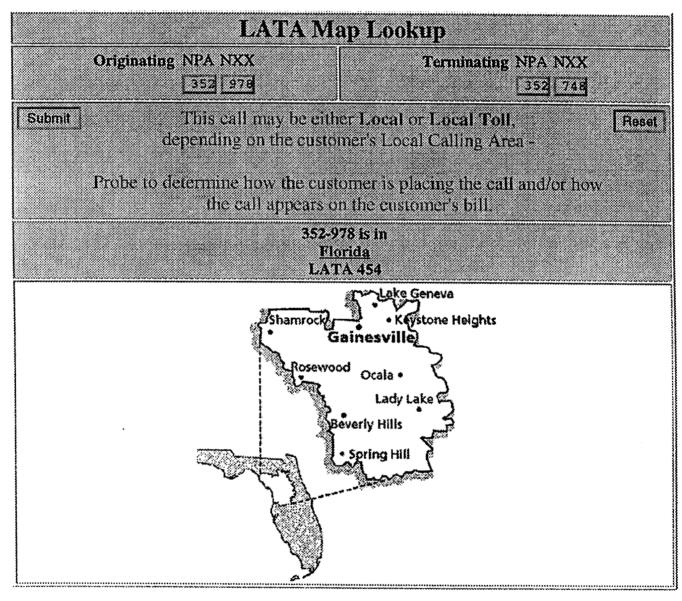




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CONTIDENTIAL

julie I. davis

From:

Sent:

To:

Cindy Sestito [Cindy.Sestito@wcom.com]
Friday, December 17, 1999 5:12 PM
julie.I.davis@wcom.com; 'Charlie Skopec'; Manoj.Sekhawat@wcom.com;
William.Eley@wcom.com
'Julie Bright-Parolek'; Rod.Ruiz@wcom.com

Cc:

Subject:

RE: FL Rate Issue

Julie

Here is a screen print from OCIS. As you see the cellular area has a 'Y' which means this line range is cellular. Hope this helps.

Cindy



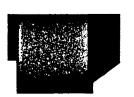
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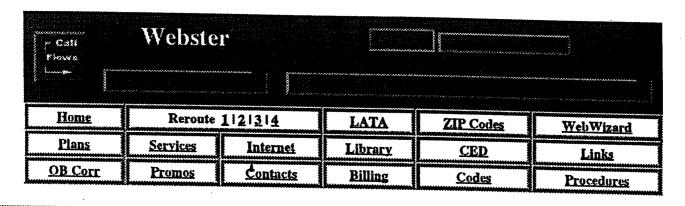
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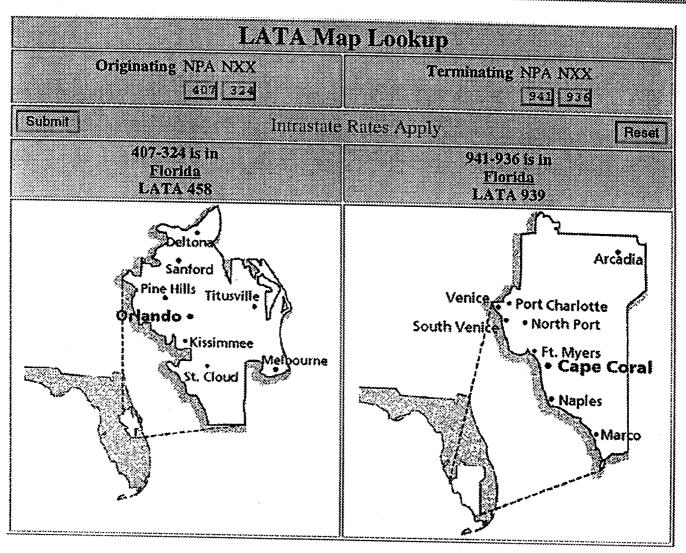
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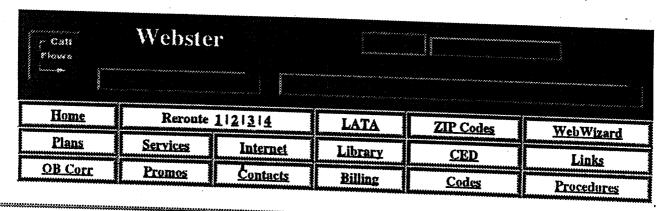
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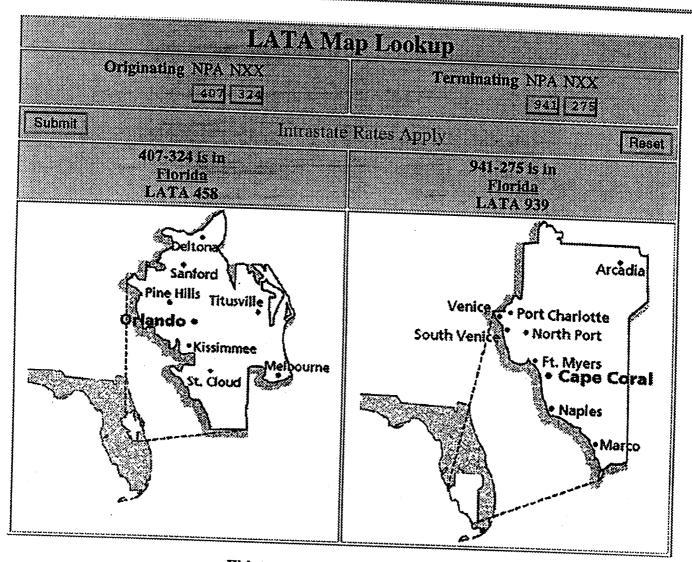


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REQUEST NO. 9

RE: BUSINESS MARKETS SAMPLE - VNET

The attached list includes 25 VNET accounts from September 98 and 25 VNET accounts from May 99. We selected the same accounts for each month. Please provide the invoices for the 25 accounts listed for both months.

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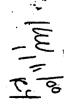
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Billed Minutes and Revenue for Intrastate Florida - September 1998

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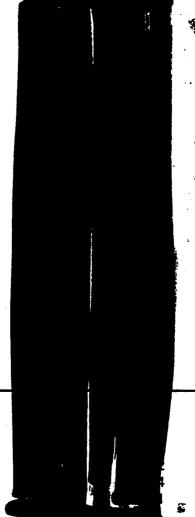
May 99

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Billed Minutes and Revenue for Intrastate Florida - May 1999

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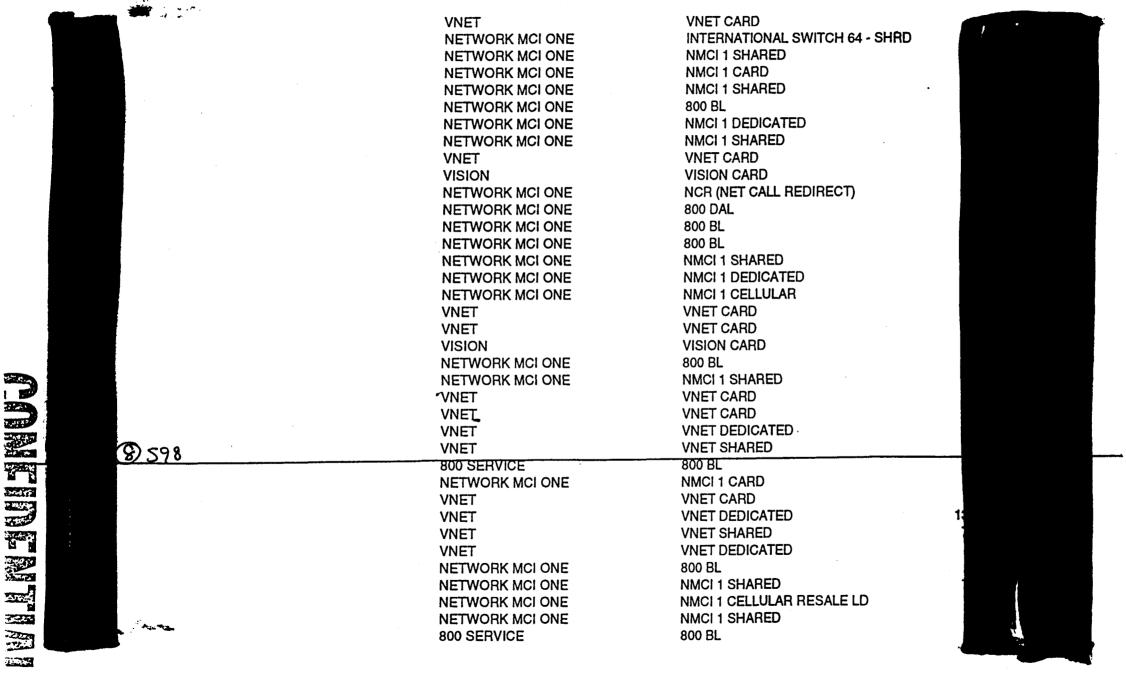


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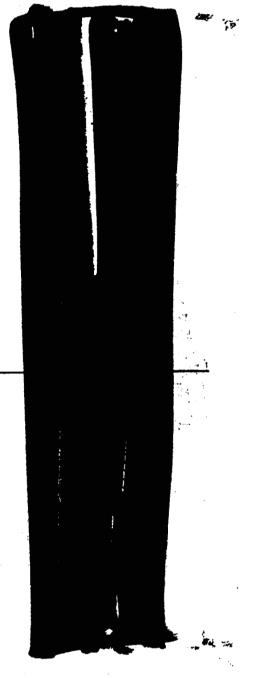


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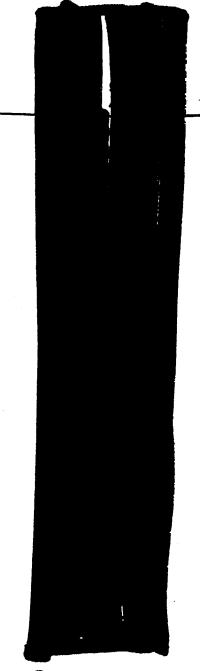
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(G)

COMPANY:

MCI WORLDCOM

TITLE:

SAMPLE OF BUSINESS RATE ELEMENT

VNET

PERIOD:

INVOICES DATED OCTOBER AND DECEMBER 98

DECEMBER 9, 1999

DATE: AUDITOR:

WP NO.

57-2/1

Staff requested invoices for the month of September 98 and the month of May 99.

The September 98 invoices were requested to test the rates to see if the July 1, 1998 Commission ordered reduction to customers was in effect. The September 98 invoices included August 98 calls. For the four invoices tested, it was determined that the FI intrastate, interlata and intralata calls did not match the tariff effective July 1, 1998.

The May 99 invoices were selected to determine if the Commission ordered reduction of October 1, 1998 was in effect. For the four invoices tested, it was determined that the FI intrastate, interlata and intralata calls did not match the tariff effective October 1, 1998.

The Company explained that "the July 1998 flow through reductions were accepted by the commission during the month of September, thus billing begins with September traffic showing up on the October invoices. The October 1998 reductions were accepted by the commission in November, thus billing begins with November traffic showing up on the December invoices".

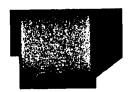
Therefore, the company supplied us with October 98 and December 98 invoices.

CONCLUSION ON TARIFF CHANGES

The order stated that the first reduction should go into effect July 1, 1998. The company did not start billing their customers for the reduction until September. The second order also stated the second reduction should go into effect October 1, 1998. The company did not start billing their customers for the reduction until November.

Staff also determined as stated in Disclosure No. \$ that his tariff was changed again effective January 28, 1999 increasing the rates to amounts equal to or higher than the amounts in effect prior to the July 1, 1998 flow through reduction. Therefore, the second reduction was only in effect for billing in the months of November, and December 98, and January 99.

It also should be noted that there were no retroactive credits to customers for the July and August 98 traffic and for the October and November 98 traffic. The Outpany



COMPANY:

MCI WORLDCOM

TITLE:

SAMPLE OF BUSINESS RATE ELEMENT

VNET

PERIOD:

INVOICES DATED OCTOBER AND DECEMBER 98

DATE:

DECEMBER 9, 1999

AUDITOR:

RKY

WP NO.

57-2/1

Results of the test of these invoices showed that:

SOURCES: Company supplied Invoices dated October 98 and December 98. Tariffs dated July 1, 1998 (46-2/1pg3) and (45-1/5) and October 1, 1998 (46-2/1pg5) and 45-2/5).

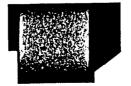
Staff determined from the bills whether the calls were interlata or intralata, day or night and then calculated the minutes times the tariffs that were supposed to be effective at that time. Any discrepancies are noted in the footnotes.

As some of the business bills were 1000 pages or more, staff asked the company to select those pages with FI Intrastate Calls at random. We did not receive the full bills. We selected calls on these pages at random to recalculate. We tried to select both intralata and interlata and day and night where available.

KEY = OK = Tariffs billed correctly

	OCT 98	NOV 08	
SAMPLE NO. " ACCOUNT NO	. " INVOICE	" INVOICE	•
1"	NOTE A	NOTE A	
	* OK	" OK	
3"	" NOTE B	" NOTE B	"
4 "	" NOTE A	" NOTE A	
5 "	" NOTE C	" NOTE C	**
6 "	" No FI Intrastate	" NOTED & B	"
7 "	* OK	" OK	
8 "	" OK	" OK	
9 "	" NOTE E	" NOTE E	" Newland de 57-2/3
(X) 10 "	" NOTE B	" NOTE B	" on 12/20 Say 12/23 anower
11 "	" OK	" OK	,
12 "	" NOTE F	" NOTEF, (Nos	luck) " or 12/26 Land 12/23 answer
13 "	<i>l</i> " missing	" missing	
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15 "	* OK	" OK	***
16 "	" NOTE C	" NOTE C	" resolved on 57-2/3002.
17 "	" OK	" OK	" 3 3 3
18 "	* OK	" OK	•
. 19 "	" OK	" OK	H
20 "	" OK	" OK	
21 "	" OK	" ØK	
22 "	" OK	" OK	
(2) 23 "	" MISSING	" NOTE B	" on 12/20 said 12/23 arow
24 1,:.	" NOTE A	" NOTE A	V. 12 100 Such 104 23
15 00 11		1101271	

CONTRACTOR 0002527-2



COMPANY:

MCI WORLDCOM

TITLE:

SAMPLE OF BUSINESS RATE ELEMENT

VNET

PERIOD: DATE: **INVOICES DATED OCTOBER AND DECEMBER 98**

DECEMBER 9, 1999

AUDITOR:

RKY

WP NO.

57-2/1

25 "

ОК

OK

FOOTNOTES

NOTE A - The company did not provide any invoices for these accounts because they said

d

NOTE B - This bill is a calling card bill. The minutes times the tariff do not result in the same amounts on the bill.

NOTE C - The tariff on this invoice appears to be VNET SW-DED. How do we tell from the bill that this is what is supposed to be billed. OK if SW=Ded tariff.

NOTE D - This invoice contains both switched and calling card. The calling card minutes times the tariff does not agree.

NOTE E - This is a calling card bill. The day calls calculate correctly. However, \$.40 is added to the night calls and this is not on the tariff. Lead 12-2

NOTE F - Does not agree with any Vnet tariff. What tariff is this?

NOTE G part of this bill is for a calling card. What tariff was used? Is it VNET? It also appears that .40 cents has also been added to the night calls when this is not on the tariff.

The envoce endedul that the 12/98 sill is for cellular

CONFIDENTIAL



14/1/00

CONCLUSION ON SAMPLE:

We requested 50 invoices in total. 25 for Oct 98 and 25 for Dec 98. As stated before, as some of the business bills were 1000 or more, staff asked the company to select those pages with Fl intrastate calls at random. We did not receive full bills. The company did not send us any bills where they could not find Fl intrastate calls. We realize this is not a way to pull a sample, but were hindered because of the magnitude of the size of the bills and the company delays. We accepted this and reduced our sample.

S1-2

Our sample ended up being 42 invoices.

We found the following in the 42 invoices.

Two invoices supplied to us did not have any Florida intrastate calls.

Eight invoices did not compute when calculating the minutes times the tariff.

32 invoices calculated correctly using the rate per minute in the company documentation supporting their interexchange flow through work sheet.

51-2

Regarding the eight invoices that did not compute, the company stated that these were Special Contract Arrangement Vnet accounts. They stated that there were special discounts that were included in the rate prior to the billing and would not compute. They stated that their authority for this was Florida Rule 25-24.485(I)(a). This is on Work paper No. 170/1. Their interpretation of this rule is the this allows "...interexchange carriers to offer contract services without having to disclose the usage rates in the tariff".

Even though these accounts were included in the population we requested for the Vnet sample, the company stated that these accounts were not included when calculating the Vnet reduction on the Interexchange Flow Through Worksheet.

CONFIDENTIAL 900254

MCI WORLDCOM

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

Be

December 1, 1999

Kathy Welch
Miami District Office
Florida Public Service Commission
3625 NW 82 Avenue, Suite 400
Miami, FL 33166-7602

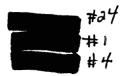
RE: Request 12 for MCI

Dear Ms. Welch:

The following is in response to Ruth Young's Request 12 for MCI dated 11/11/99. The enclosed invoices are provided as evidence that the rate reductions were implemented in billing. These invoices are for the months of October and December 1998. The July 1998 flow through reductions were accepted by the commission during the month of September, thus billing begins with September traffic showing up on the October invoices. The October 1998 reductions were accepted by the commission in November, thus billing begins with November traffic showing up on the December invoices.

Invoices are included for all accounts selected except the three listed below. The invoices for these accounts do not show any Florida intrastate traffic for the months of October through January.

Customer Numbers:



Should you require additional information in regards to this filing, please do not hesitate to contact me at 800-759-3813.

Sincerely,

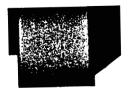
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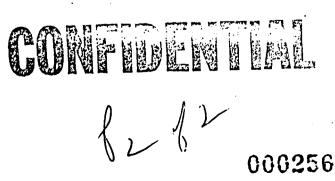
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			N III

<u> </u>	QUESTIONS REGARDING VN	ET TARIFF Ry (2)	. •
	This is to summarize our conve and the verbal requests on that	rsation of November 11, 1999 date.)
	found that the FI Intrastate, intellinvoice dated 9/10/98. The 9/10/98 order the reduced rates shexplained the rate may have be months that the customer was referred.	our company invoices sent to me for the VNET to rlata and intralata calls did not match the tariff for 0/98 invoices included August 98 calls. According to later and the sent changed on a later invoice with a credit for the tot billed the reduced rate. You said you would fort and if a credit was given for the reduction.	r the ng to the ne
		nth the reduced tariff went into effect showing the ithe reduced tariff FI to FI calls.	e credit,
	have gone into effect on Octobe was increased after the Octobe	ne four company invoices again did not match the er 1, 1998. You said you would look into this. It is r 1, 1998 reduction. If this is the case, provide the ber 1, 1998 reduction went into effect.	may be that the rate
		ber 1, 1998, provide the invoices for the month the calculation of the credit, and the reduced tariff	
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AUDIT DISCLOSURE 2

SUBJECT: EFFECTIVE DATE OF BILLING FOR REDUCED TARIFFS FOR "VNET BUSINESS SERVICE"

STATEMENT OF FACTS: In PSC Order No 98-0895-FOF-TP, issued June 8, 1998, the Commission stated that the Interexchange Carrier tariffs and supporting documentation for the July 1, 1998 reduction should be filed no later than June 30, 1998, with a July 1, 1998 effective date. Also, the tariffs and supporting documentation for the October, 1998 reduction should be filed no later than September 30, 1998 to be effective October 1, 1998.

In order to determine if the Interexchange Carrier reduced the rates to its customers for the July and October 1998 reductions from the Local Exchange Companies, staff requested a sample of invoices for the months of September 1998 and May 1999. September 1998 was selected to determine if the July 1, 1998 reductions were in place to the customers, and May 1999 was selected to determine if the October 1, 1998 reduction were in place to the customers. The rate element selected for testing was the "Vnet Business Service." Testing of four of these sample items for each month showed the rates billed the customers did not agree with the tariff.

372

The company explained that "the July 1998 flow through reductions were accepted by the commission during the month of September, thus billing begins with September traffic showing up on the October invoices. The October 1998 reduction were accepted by the commission in November, thus billing begins with November traffic showing up on the December invoices." Therefore, we asked the company to supply us with the October 1998 and December 1998 invoices. The results of the test of these invoices is addressed in Audit Disclosure 5.



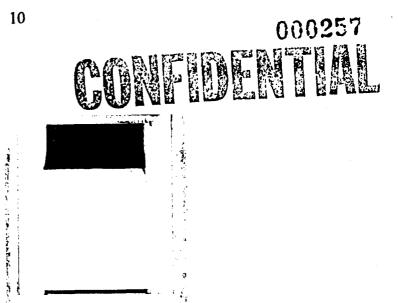
Also, at the same time we requested these October 1998 and December 1998 invoices, we asked the company to provide us with the invoices that show the credits the customer received for the months the reduction did not go into effect. The company said they were researching this. To date, we have not received data showing credits.



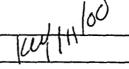
OPINION: The PSC order stated that the first reduction should go into effect July 1, 1998, and the second on October 1, 1998. The Interexchange Carrier did not reduce billing rates to its customers for the first reduction until September, and did not start billing their customers for the second reduction until November. Therefore, the July 1, 1998 reduction did not flow through to the customer for the months of July and August, and the October 1, 1998 reduction did not flow through for the month of October.



Since we have not received documentation for the credits for the above months, we cannot tell if the customers were given the reductions effective from the dates of the Commission order for this rate element. The other rate element sampled was the residential Execunet Service. It appears that the reductions were in effect at the effective dates.









As stated in Audit Disclosure 1, the "Vnet Business Service" tariff was changed again effective January 28, 1999 increasing the rates to amounts equal to or higher than the amounts in effect prior to the July 1, 1998 flow through reduction. It appears that the second reduction was only in effect for billing the months of November and December 98, and January 99.

11

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ARC

Letter to Ms. Young December 17, 1999 Page 2

that this AVI is cellular. Cellular service is not regulated and cellular rates are not required to be tariffed.

Note D and E → Account

The calls in question are a 21 minute call which originated at 6:58 p.m. on March 12, 1998 and billed \$3.54 and a 12 minute call which originated at 6:55 pm on April 26, 1999 and billed \$2.16. These calls are designated as "Day" [i.e., Peak] calls on the invoice. This designation is determined from the origination time of the call. However, the day period ends at 7:00 pm. In cases such as this when a call crosses time of day boundaries, the call is rated by designating the appropriate per minute rate to those minutes falling into the peak and off-peak categories respectively. To illustrate I have outlined the calculations for the two calls in question below.

March 12, 1998 call

$$6:58 - 6:59 = 2$$
 minutes \times \$.25 = \$.50

$$7:00 - 7:18 = 19$$
 minutes x $\$.16 = \3.04

Total call =
$$21 \text{ minutes} = \$3.54$$

April 26, 1999 call

$$6:55 - 6:59 = 5$$
 minutes x $$.25 = 1.25

$$7:00 - 7:06 = 7$$
 minutes x $\$.13 = \0.91

Total call =
$$12 \text{ minutes} = $2.16$$

In addition, Exhibit D indicates that these calls were properly charged the interLATA usage rates.

2. Answer to Request No. 4

V NOT SAMP

Account No. Not B7.2

I have relayed this information to our billing audit group and should have a response by December 23, 1999.

#3

D= Rixplains on wp 4

51-2 000259 CONFIRENTIAL Letter to Ms. Young December 17, 1999 Page 2

	Fage 2
	the s
Vande 2.	Account 122 Junt #65
*5	These calls are Dedicated Access origination and Switched Access termination. See Exhibit E for explanation. Nesolust. The said character origination as deducted to the preparation as deducted.
#6 3.	Account Stuff did not how to read the
*** ()	I have relayed this information to our billing audit group and should have a response by December 23, 1999. Note: D+B m 57-2
4.	Account
4. A. A. A. A. A. A. A. A. A.	The \$.40 charge is a surcharge that applies to all Vnet card calls. This is tariffed in section 4.1.9.2.1 of the Florida tariff. This section is a subset of section 4.1.9.2 Rates and Charges and is not subject
5.	is a subset of section 4.1.9.2 Rates and Charges and is not subject to time of day. Stuff's rerender of Court Account
¥16 (I have relayed this information to our billing audit group and should have a response by December 23, 1999.
6.	Account Account Account
#/2 G	10/98 – I have relayed this information to our billing audit group and should have a response by December 23, 1999.
•	12/98 - See Exhibit F. These calls are identified as cellular calls on the invoice. Cellular service is not a regulated service and therefore per minute rates are not required to be tariffed.
√ 7.	Account
*16	Same as No. 2 above. 6
8.	Account .
1 #14	The Dial One access portion of these bills is accurate. The \$.40 is applicable as described in No. 4 above. For the calculation of the
	CONFIDENTIAL

Letter to Ms. Young December 17, 1999

card charges, I have relayed this information to our billing audit group and should have a response by December 23, 1999.

#

2₃ 9.

Account

-10/98 - invoice included as Exhibit G

12/98 - I have relayed this information to our billing audit group and should have a response by December 23, 1999.

10. Account

These invoices were not included in the original package as they have no Florida usage for the months of October and December.

WorldCom Technologies

1. Request No. 11

The World One invoices are being shipped via overnight mail from Chris Pace in Clinton, MS. You should receive these on 12/20/99.

2. Requests 10 and 12

This information will be provided the week of 12/20/99. I would like to arrange a conference call with our internal subject matter experts to go over this information and answer any questions you may have. Please contact me with your schedule.

3. Classic

See Exhibit H

The information in Exhibits E through H contains some confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom appreciates your handling this matter as confidential.

Please feel free to contact me with any questions or concerns regarding this information.

Sincerely,

uli¢ L. Davis

Regulatory Manager

000261

CONFIDENTIAL

MCIWORLDCOM

December 17, 1999

Law & Public Policy
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Ruth Young
Miami District Office
Florida Public Service Commission
3625 NW 82 Avenue, Suite 400
Miami, FL 33166-7602

RE: Letter of December 10, 1999 concerning IXC Flow Through Worksheet Audits of MCI WorldCom and WorldCom Technologies

Dear Ms. Young:

Per the above mentioned letter the following responses are being provided.

MCI WorldCom

1. Answer to request No. 13.

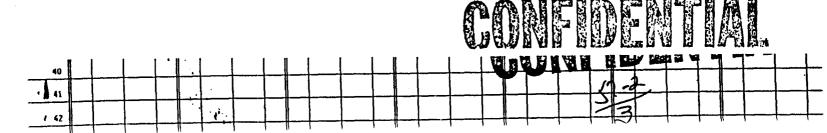
Note A - Acount

The calls in question on April 3, 17, and 24 were listed on the customer's invoice as being 3 minutes in duration and billed at \$.75. Your notes indicate these calls are intraLATA and should have been billed at \$.12 per minute resulting in a charge of \$.36. Our research indicates that all three calls are interLATA and were therefore billed correctly at \$.75 each. The April 3 and April 24 calls originated from NPA-NXX 904-503 [LATA 456] and terminated at 904-705 [LATA 452] (see Exhibit A). The April 17 call originated from 904-503 [LATA 456] and terminated at 904-277 [LATA 452] (see Exhibit B).

Notes B and C - Account

The calls in question are:

April 19, 1998 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; May 10, 1999 a one minute call from 352-978 [LATA 454] to 352-748 [LATA 454]; and May 14, 1999 a 3 minute call from 352-978 [LATA 454] to 352-307 [LATA 454]. According to the customer's invoice these are interLATA calls. As you can see in Exhibit C, my initial research agrees with your note indicating these are intraLATA calls. However, also included in Exhibit C is an email containing a print screen from OCIS [On-line Customer Information Service]. This screen indicates



WORLDCOM

December 21, 1999

Law & Public Policy Six Concourse Parkway **Suite 3200** Atlanta, GA 30328

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

in more

RE: Follow up responses for MCI Vnet request No. 14

Dear Ms. Young:

The following are the outstanding items for Request No. 14 regarding Vnet

		SCA	Special Karman
1.	Account No.	11/1	
3.	Account No.	au il	secret Contin. L.
5.	Account No.	Casa	co 1/-1.

Account No.

Account No.

Con result in Non destince sensetive flot rote pursuent to k

All of the above accounts are large volume customers and as a result may contain embedded discounts in their rate structure. This can make it difficult to match the invoice with the tariff rate. However, I was able to obtain actual screen prints of our billing system for Vnet service. Copies of these are attached, and I have also included a copy via disk as the detail is very fine and may be difficult to read. These print screens are the actual rate tables from billing and show the effective date of each rate, the rate itself, and the end date [i.e., next tariff revision date]. This information verifies that the correct rates were implemented for Vnet service following both access reductions.

These print screens are considered confidential and MCI WorldCom appreciates treatment as such.

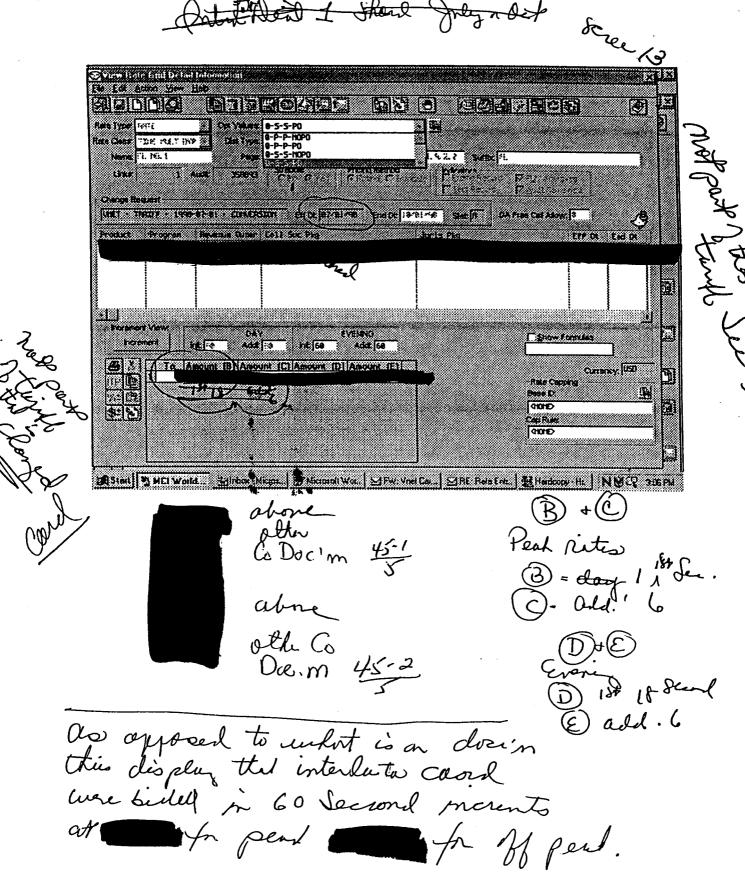
Should you require additional information, please feel free to contact me at 800-

759-3813.

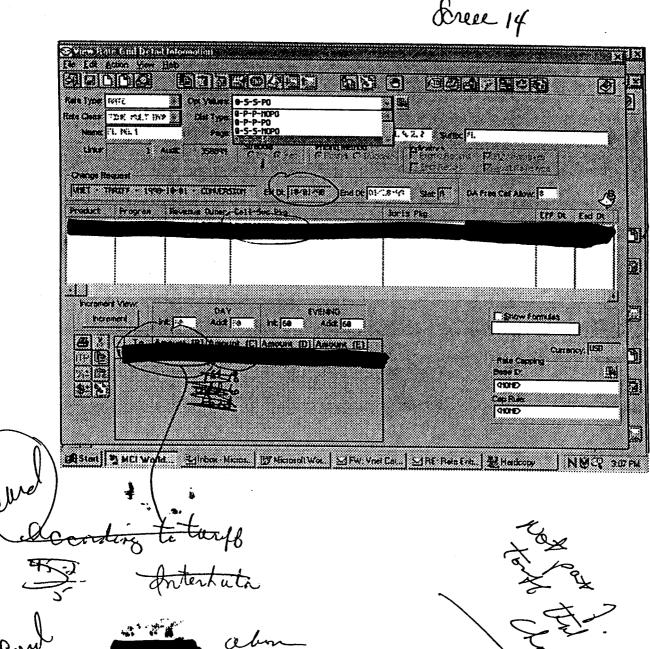
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Regulatory Manager

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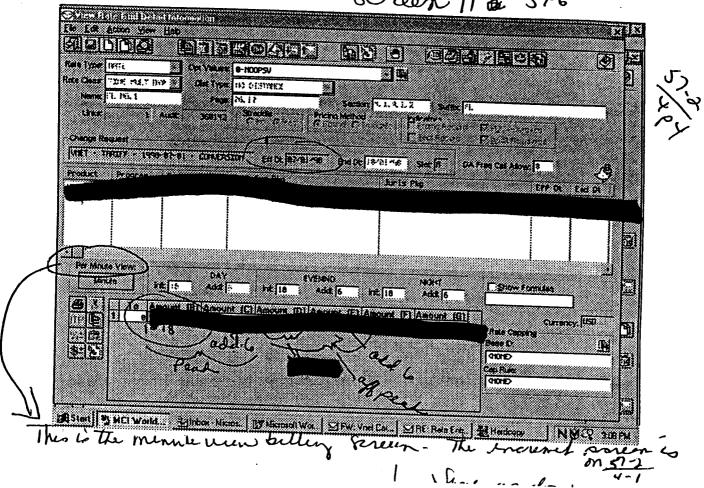
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CONFIDENTIAL 51-2 4p3

Screen 11 57-6

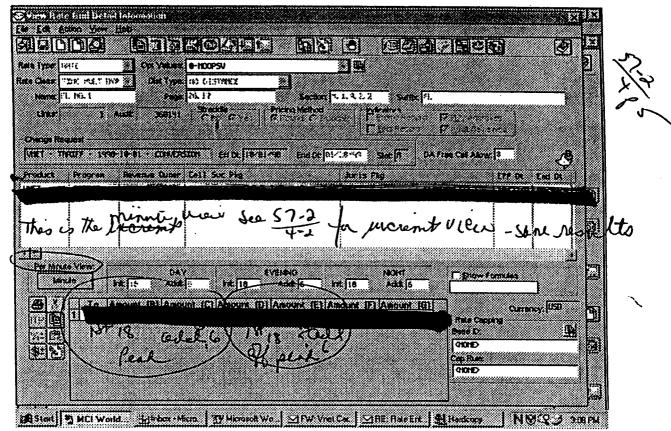


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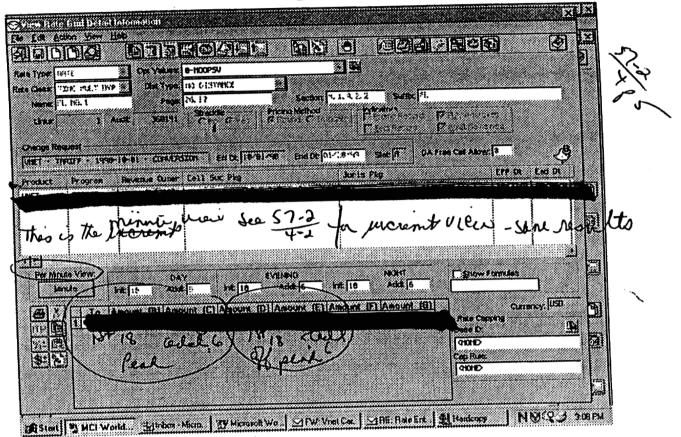
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CONFIDENTIAL 51-2

MCI WORLDCOM COMPANY: **RECALCULATION OF** TITLE: **BLENDED RATES FOR VNET TARIFF** JULY 1, 1998 and OCTOBER 1, 1998 PERIOD: DATE: **JANUARY 7, 2000** RKY AUDITOR: WP NO. 45-1-5-1 **Effective** Effective Effective Effective OCTOBER \$ 1998
Calculation using OCTOBER 1, 1998 JULY 1, 1998 JULY 1, 1998 Calculation using Calculation using Calculation using VNET_SW-SW INCLUDING CARD billing system wPerno. 57-2/4 billing system wP no. 57-2/4 billing system wP billing system wP no. 57-2/4 INTERLATA no. 57-2/4 INTERLATA: INTERLATA INTERLATA OFF PEAK PEAK OFF PEAK PEAK 11.2 17-2 Blended rate per Company documentation The difference is because of rounding.
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An example of how the different methods of calculating this bring about the same results that a billed to the customer, is included on WP No 57-2/6 page two.

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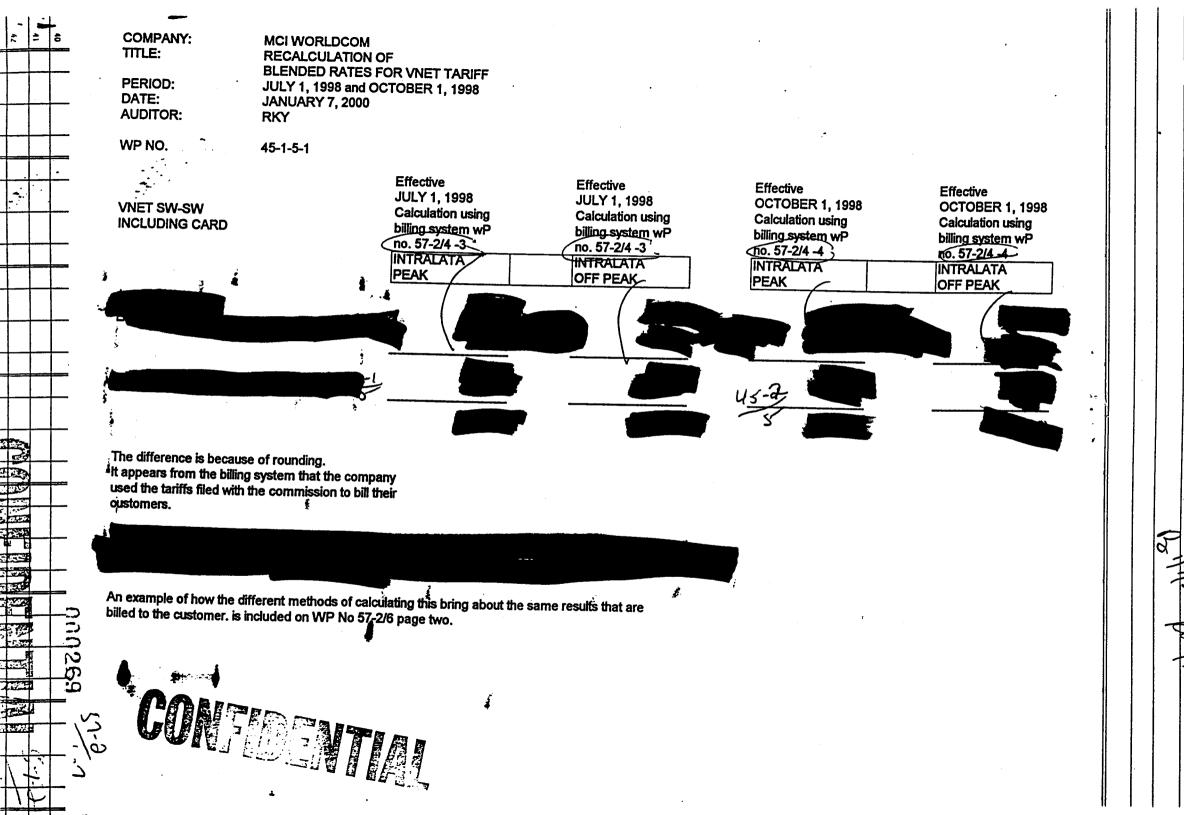
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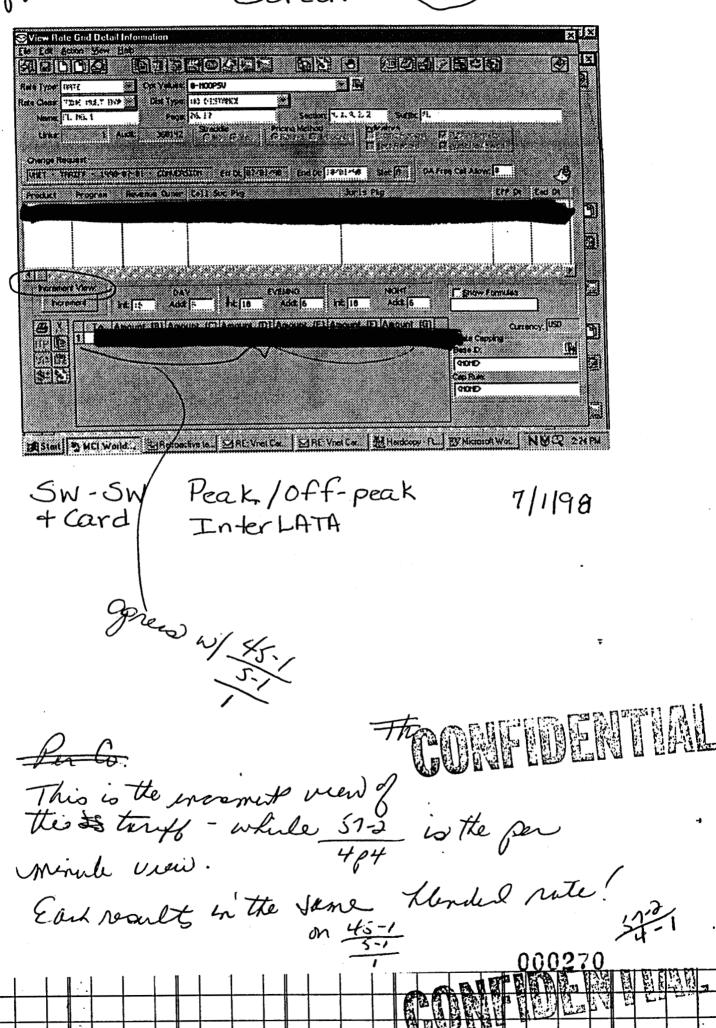
MCI WORLDCOM COMPANY: RECALCULATION OF TITLE: **BLENDED RATES FOR VNET TARIFF** JULY 1, 1998 and OCTOBER 1, 1998 PERIOD: DATE: **JANUARY 7, 2000** AUDITOR: RKY WP NO. 45-1-5-1 Effective Effective Effective Effective OCTOBER 1998
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billing system wP
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An example of how the different methods of calculating this bring about the same results that are billed to the customer, is included on WP No 57-2/6 page two.



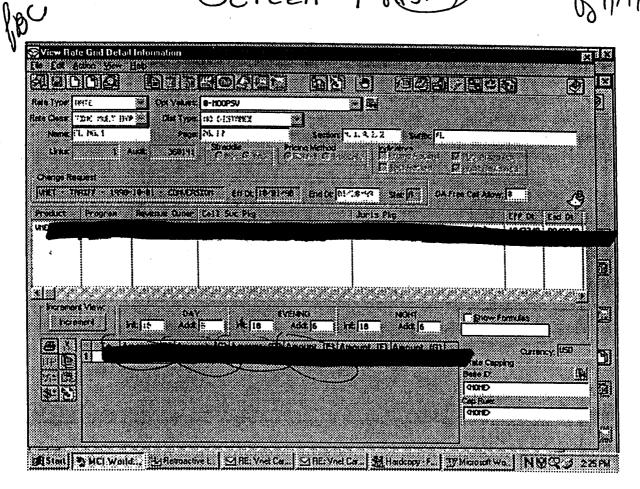
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Screen 7 057-9

B1/14/00



Sw-Sw & Card

Peak/Off-Peak InterLATA

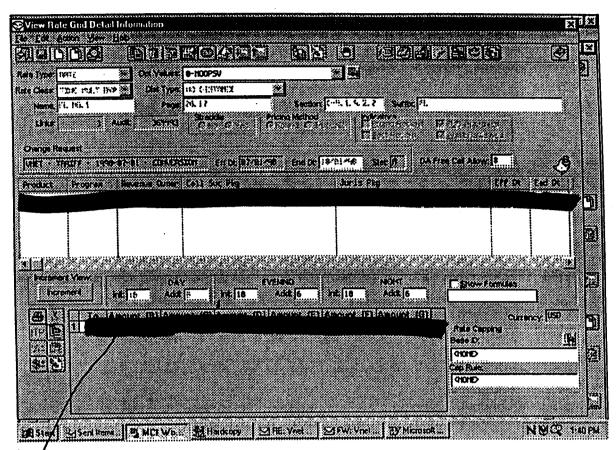
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SW-SW 4 Card

Peak/Off-Peak IntraLATA

7/1/98

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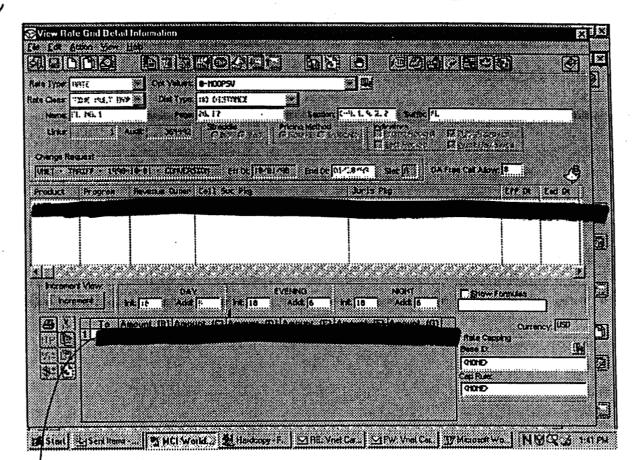
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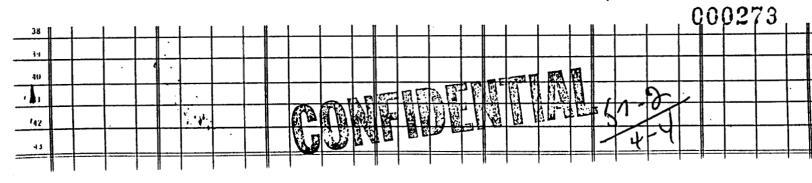
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10/1/98

agreed w/ Co die/m m 45-2

CONFIDENTIAL 51-9





December 29, 1999

Law @ Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

PBC

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Vnet Response

Dear Ms. Young:

Per our phone conversation following please find two tariff sheets referencing Special Customer Arrangements and Special Service Arrangements. You will note that Sheet 28.1.0.2 indicates that the rates and terms and conditions for these special contracts will be tariffed. However, several years ago the commission revised this requirement allowing interexchange carriers to offer contract services without having to disclose the usage rates in the tariff. I have included a copy of the FL rules referencing this matter [Rule 25-24.485(1)(a)].

Should you require additional information, please feel free to contact me at 800-759-3813.

Julie L. Davis & Slaws

CONFIDENTIAL SASS

MCI TELECOMMUNICATIONS CORPORATION

F.P.S.C. TARIFF NO. 2 1ST REVISED SHEET 18 CANCELS ORIGINAL SHEET 18

SECTION 2 - RULES AND REGULATIONS

2.16 SPECIAL CUSTOMER ARRANGEMENTS

2.16.1 In cases where a customer requests special arrangements which may include engineering, installation, construction, facilities, assembly, purchase or lease of facilities, and/or other special services not offered under this tariff, HCI, at its option, will provide the requested services. Appropriate recurring and/or non-recurring charges will be developed accordingly.

ISSUED: January 30, 1990

EFFECTIVE: MAR 0 1 1990

by:

Liz Whitley
Manager, Rates and Tariffs
400 Perimeter Center
Atlanta, Georgia 30346

000275

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MCI TELECOMMUNICATIONS CORPORATION

P.P.S.C. TARIFF NO. 2 1ST REVISED SHEET 28.1.0.2 CANCELS ORIGINAL SHEET 28.1.0.2

SECTION 4 - RATES

4.5 SPECIAL SERVICE ARRANGEMENTS

Upon appropriate circumstances, the Company may enter into Special Service Arrangements furnished in lieu of existing tariff offerings. All rates and charges for specific service(s) provided will be negotiated on an individual case basis. In such circumstances, the rates, terms and conditions applicable to such special contractual offerings will be specified below, with pross-reference to the particular contract involved.

4.5.1 University of Plorida

- This tariff offering is a Special Service Arrangement (85A) for Vnet Service and University Calling Card Service being provided to the University of Florida in response to the Request for Proposal No. 93P93.
- The Vnet Service being provided under this special Service Arrangement is described in Section 3.5.9 of 2. this tariff.
- The University Calling Card Service is a customized Calling Card Service which is offered to the University c. of Florida pursuant to the terms and conditions contained in the NCI Response. The service is a one-way, dial-in-dial-out multipoint service. Subscribers can originate calls from any tone-dial phone via an "800" number.

Regulations

The General Conditions, Specifications and Special Requirements of the Request for Proposal No. 93P93 shall be considered as part of this Special Service Arrangement.

Rates and Charges

Vnet Service

EVENING BUSINESS DAY NIGHT/WEBKEND

\$.1080 \$.0756 \$.0756

B. University Calling Card Service

EVENING MIGHT/WEEKEND BUSINESS DAY

\$.1583 5.1413 \$.1413

CERTAIN MATERIAL LOCATED ON THIS SHEET WAS PREVIOUSLY FOUND ON SHEET 28.1.0.4.

ISSUED: June 28, 1996

· •

EFFECTIVE: July 1, 1996

by: ,

Julie L. Davis Hanager, Rates and Tariffs 780 Johnson Ferry Road Suite 700 Atlanta, Georgia 30342

CO0276

Supp. No. 185

TELEPHONE COMPANIES

CHAPTER 25-24

25-4.077	Metering and Recording Equipment	All
25-4.160	Operation of	Subsection (1)
•	Telecommunications	

Relay Service
A company may act as an agent of the customer in obtaining service from (2) A company may act as an agent of the customer in obtaining service from the local exchange company, provided the local exchange company bills the customer directly for the service rendered. Specific Authority: 350.127(2), F.S. Law Implemented: 364.01(4), 364.07, 364.17, 364.14, 364.15, 364.16, 364.185, 364.19, 364.30, 364.337, 364.3375, 364.345, 364.386, 427.704, F.S. History--New 2/23/87, Amended 6/24/80, 9/16/92, 2/3/93, 3/13/96, 02/01/99.

25-24.480 Records & Reports; Rules Incorporated.

(1) The following rules are incorporated herein by reference and apply to interexchange companies. In these rules, the word "local" should be omitted or interpreted as "toll", as they shall apply only to interexchange and not local service.

		PORTIONS NOT
SECTION	TITLE	APPLICABLE
25-4.019	Records and Reports in General	None
25-4.020	Location and Preservation of Records	Subsections(1), (3)
25-4.023	Report of Interruptions	Subsection (1)
25-4.043	Inquiries	None
25-4.0161	Regulatory Assessment Fees	None ·
25-4.079	Hearing/Speech Impaired Persons	Subsections (1), (2), (3), and (5)
25-4.115	Directory Assistance	Subsections (1), (2)

- (2) Each company shall file updated information for the following items with the Division of Telecommunications and the Division of Records and Reporting
- within 10 days after such changes occur.

 (a) The address of the certificate holder's main corporate and Florida offices (if any) including street name and address and post office box, city, state and zip code.
- Telephone number, name, and address of the individual who is to serve (b) as primary liaison with the Commission in regards to the ongoing Florida operations of the certificated company.

Specific Authority 350.127(2) FS.

Law Implemented 350.113, 350.115, 350.117, 364.17, 364.18, 364.185, 364.337 FS. History-New 2-23-87, Amended 4-5-88, 7-11-88, 6-3-90, 10-25-90, 11-20-91, 12-29-91, 12-22-92, 12-27-94, 3-13-96, 10-1-96.

25-24.485 Tariffs.

All tariffs must be filed with the Commission, using the following guidelines, before becoming effective.

(1) General.

Each company shall maintain on file with the Commission tariffs which (a) set forth all of the rates and charges for customer services, the different services available to subscribers and the conditions and circumstances under which service will be furnished. Interexchange carriers are authorized to provide services to other certificated telephone companies by individually negotiated contract rates in addition to filing and providing those services to end users pursuant to tariffs. When an interexchange carrier chooses to utilize such

24-6

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12/29/99 WED 17:15 FAX 770 284 5533

MCI WORLDCOM REG AFFAIRS

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Supp. No. 185

TELEPHONE COMPANIES

CHAPTER 25-24

individually negotiated contract rates for services to other certificated telephone companies, and in any other instances in which the Commission has authorized contract rates for specific offerings, the conditions under which such contracts may be offered shall be clearly stated in the company's tariff but the contracts themselves need not be part of the tariff. The contracts must, however, be available for Commission review. The tariff shall not include charges for customer premises equipment.

(d) Each company shall provide support to accompany any proposed changes

as outlined in subsection (4).
(c) The tariff will be Florida-specific and all rates, charges, and service descriptions shall be for intrastate usage, unless interstate rates are necessary to compute the intrastate portion of a customer's monthly bill; then, the interstate rates, charges, and service descriptions shall also be quoted in the tariff to the extent necessary to compute the intrastate portion of a customer's

(d) The tariff must be clearly expressed in simple words, sentences and paragraphs. It must avoid unnecessarily long, complicated or obscure phrases or acronyms so that the customer will understand that for which he is contracting.

(e) The tariff shall be written in a manner such that service will be provided on a non-discriminatory basis. No public statement of service quality,

- rates, or service offerings or billings should be misleading or differ from those stated in the tariff.
- stated in the tariff.

 (f) A printed notice shall be kept posted by each company in a public and conspicuous place in each office where application for service may be made stating that its tariff and standard contract and agreement forms are on file at that office and are open to examination by any person. The company will also make available a list of the exchanges it serves.

 (g) All proposed changes to the existing tariff shall be directed to the Director of the Division of Telecommunications, Florida Public Service Commission, 2540 Shumard Oak Boulevard. Tallahasses. FL 32399-0866. A filing must be received

Director of the Division of Telecommunications, Florida Public Service Commission, 2540 Shumard Cak Boulevard, Tallahassee, FL 32399-0866. A filing must be received by the Division of Telecommunications before 5:00 p.m. of a normal Commission workday in order for it to be "filed" on that day.

(h) All tariff changes shall be submitted to the Commission in quadruplicate in the form prescribed herein. After the effective date, one copy stamped "received" will be returned to the company, which shall be the notice to the company that the filing has been received and is on file. If acknowledgement of the filing at the time of receipt is desired, the letter of transmittal shall of the filing at the time of receipt is desired, the letter of transmittal shall

be sent in duplicate with a request that the duplicate be returned

- (i) Companies shall charge only the rates contained in their tariff. If a company desires to charge rates or charges at a lower level than is contained in an existing tariff and wishes to charge those lower rates only temporarily and afterwards return to the existing tariff level, it may, instead of filing two tariff revisions to decrease and then later increase the rate, file a single tariff change reflecting the conditions of the temporary tariff change. Such tariff provision shall include the heading "Promotion," and shall state the specific tariff charges to be reduced, the temporary level of charges, a description of the customers who would be eligible for the decrease, the conditions under which customers would receive a decrease, and the beginning and ending dates of the reduction. The tariff page(s) describing the terms and rates of the temporary reduction shall immediately precede the permanent tariff pages for the service in reduction shall immediately precede the permanent tariff pages for the service in the same section of the tariff.
- (j) The requirements of the following subsections shall apply on a prospective basis from the effective date of this rule. Existing tariffs on the effective date of this rule need not be amended to comply with the following except upon Commission staff request.

(2) Effective Date.

24-7

000278 CONFIDER



CONFIDENTIAL

Law & Public Policy
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

January 5, 2000

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Follow Up Response for Vnet Request No. 14

Dear Ms. Young:

As follow up to our January 4 phone conversation regarding the Vnet invoices, the spreadsheets for the 7/1/98 and 10/1/98 Business Markets reductions originally provided in the August 25 package contain the rate analysis used by MCI's tariff department for the purpose of filing the access reduction tariff revisions. This information is provided by the Business Markets analysis department and is made up of data pulled from our billing system. The print screens provided in the December 21, 1999 package are actual screens from our billing system identifying the rates that were input in billing effective 7/1/98 and 10/1/98 for Vnet services. While the spreadsheets contain the data used to "back-up" MCI's rate reductions, they are not billing documents and may show slight variations when compared to the actual billing print screens. The following explanation is being provided to explain these possible discrepancies.

Comparing the 7/1/98 spreadsheet data for Vnet switched to switched and print screen data for Intradial 1 ***SHR you will note what appears to be a discrepancy in the per minute rates. For example, the spreadsheet identifies the 18 second rate to be \$0.0646 and the print screen identifies an 18 second rate of \$0.215333. Vnet service is billed in 18 second initial increments and additional 6 second increments. When a rate is revised in the tariff, the billing contact inputs the new rate information directly into the billing system from the actual tariff page. Please note that the 7/1/98 Vnet tariff page indicates an 18 second initial rate of \$0.0646. The billing system is formulated so that as the billing contact inputs this incremental rate it automatically calculates what the full minute rate would be if the call were billed in only 18 second increments. This is the rate that is reflected under "Amount (B)" on the print screen (i.e., $$0.0646 \times 60 / 18 = 0.215333). Also note that the print screen indicates the billing increments as well. The same procedure is repeated for the additional 6 second increment.

CONTIDENTIAL - 51-2

Letter to Ruth Young January 5, 2000 Page Two

When analysis is done for the purpose of revising rates, the business analyst pulls the data from the billing database and then inputs it into a spreadsheet software program. Depending on the parameters defined by the analyst, there may be slight rounding errors in his final calculations versus the actual rate in billing. However, these spreadsheets are not used for the purpose of inputting rates into billing. They are only used by the tariff adminstrator and business analyst for purposes of completing the tariff filing, and the data used from the spreadsheet is the incremental rate, not the "new rate per minute." All billing input is done from the tariff page which reflects the correct incremental rate.

While using the "new rate per minute" column from the spreadsheet will verify that customers were properly billed, this rate does not reflect the formulation of the billing system and may result in a slightly different charge depending on the length of the call. Following is an example calculating a 5.5 minute call using the Vnet switched to switched rates effective 7/1/98 from the tariff page, the spreadsheet, and the billing print screen. Due to standard rounding guidelines of rounding minutes up and charges down, you can see the final rate is no different.

5.5 minute call = 330 seconds

Tariff Page Example:

 1^{st} 18 seconds =

0.0646

add'1312 seconds =

1.118 [52 x 0.0215]

1.1826 this charge would be round to \$1.18 on the invoice

Spreadsheet Example:

\$0.2154

1.1847 this charge would be rounded to \$1.18 on the invoice

Print Screen Example:

 1^{st} 18 seconds =

 $0.215333 / 60 \text{ seconds} = .0035888 \times 18 \text{ seconds} = .0645984$

additional 312 seconds =

 $0.2150 / 60 \text{ seconds} = .0035833 \times 312 \text{ seconds} = 1.1179896$

1.182588 this charge

would be rounded to \$1.18 on the

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Letter to Ruth Young January 5, 2000 Page Three

The information provided in this letter contains confidential information as defined in 364.183, 366.093, or 367.156 F.S.

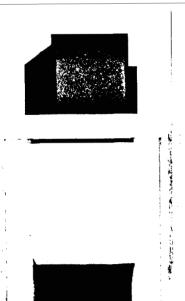
Should you require additional information in regards to this matter, please feel free to contact me at 800-759-3813.

Sincerely,

Milie L. Davis

Regulatory Manager

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CONFIDENTIAL

Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

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October 19, 1999

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: 7/1/98 and 10/1/98 Flow Through Audit

Dear Ms. Young:

Pursuant to Request No. 1 item (3) dated August 6, 1999, enclosed please find print outs of customer "Corp Ids" with product detail, minutes of use and revenues listed for the months of September 1998 and May 1999. Due to internal data retention guidelines, we are not able to provide April 1998 data and have instead provided September 1998. The data was pulled from actual call record data that feeds our billing system. As a result, you will notice the revenues quoted are carried out for several decimal places. Once this data reaches the billing system, minutes of use are rounded up and the revenues are truncated.

This data can also be used for selecting specific customer bill's to review. Select the Corp ID(s), which identifies the customer, for the products you would like to review and I will have those customer invoices pulled.

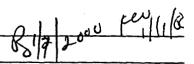
Please let me know if you have any questions regarding this material. As with the previously submitted customer information, MCI WorldCom considers this information to be of a proprietary nature.

Sincerely,

Jyssie If. Davis

Regulatory Manager

alin L. Dhu





Law & Public Policy
Six Concourse Parkway
Suite 3200
Atlanta. GA 30328

October 11, 1999

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

VIA FACSIMILE AND U. S. MAIL

RE: 7/1/98 and 10/1/98 Flow Through Audit

Dear Ms. Young:

This letter is pursuant to your request that MCI WorldCom provide customer account information in order that specific customer bills may be selected for review and audit. MCI WorldCom is segmented into two business units: Mass Markets and Business Markets. Mass Markets maintains all consumer and small business services, while Business Markets maintains all commercial business services. Both business units are currently pulling the data necessary to provide the requested customer lists. Mass Markets query should be complete within the next one to two business days making this information available on or before October 18, 1999. Business Markets has encountered some corrupt data files and is in the process of recreating these files. This process should take 24-48 hours. Once that is complete, it should take another 24-48 hours to finish pulling the data, making this information available on or before October 22, 1999.

MCI WorldCom apologizes for any inconvenience. Please feel free to contact me with any questions.

Sincerely,

Kilic L. Davis

Regulatory Manager

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Testing Grown = Mass MET VNet = Busenis METS.

W/11/00

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AUDIT DISCLOSURE 4

SUBJECT: COMPARISON OF VNET BUSINESS SERVICE REDUCED TARIFFS

51-5

STATEMENT OF FACTS: The company reduced their "Vnet" Business Service tariff in both the July 1, 1998 reduction and the October 1, 1998 reduction to the customers. The attached schedules show the per minute rate for the Switched-Switched and the Dedicated-Switched interlata/intralata day and off-peak rates.

The attached analysis shows the amounts billed to the customer at one second increments from .3 seconds to 2 minutes.

81.5

OPINION: The analysis of one second increments from .3 seconds to 2 minutes shows that because of rounding, the October 1, 1998 reduction for two minutes or less results in the same amount billed to the customer as the July 1, 1998 rates for almost half the increments analyzed. For these calls, it appears that the customer is not benefitting from the October 1, 1998 reduction.

CONFIDENTIAL 51-5 CO0284

V NETCOM. WK+

COMPANY:

MCI WORLDCOM

TITLE:

COMPARISON OF JULY 1, 1998 REDUCTION TO

OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

SERVICE.

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 DECEMBER 12, 1999 RKY

DATE: AUDITOR:

1998

SWITCHED TO SWITCHED TARIFF FOR VNET

Oct 1, 1998

	Tariff		•	Tariff		
	interLata/			InterLata/		
No. of Minutes		Amount	No. of Minutes	Day*	Amount	Difference
0.:			0.:	3 0.2086	0.06	0.00
0.4			. 0.4			0.00
0.9	5 0.2154	0.11	0.9	5 0.2086	0.10	0.00
0.6	0.2154	0.13	0.6	0.2086	0.13	0.00
0.7	7 0.2154	0.15	0.`	7 0.2086	0.15	0.00
0.8	8 0.2154	0.17	0.0	0.2086		0.00
0.9	9 0.2154	0.19	0.9	9 0.2086	0.19	0.00
	1 0.2154	0.22		0.2086		(0.01)
1.1	1 0.2154	0.24	1.			(0.01)
1.3			1.3		0.25	(0.01)
1.3	3 0.2154		1.			(0.01)
1.4			1.			(0.01)
1.			1.			(0.01)
1.4			1.			(0.01)
1.			1.			(0.01)
1.			1.			(0.01)
1.			1.			(0.01)
	2 0.2154	4 0.43	•	2 0.2086		(0.01)
					0.12	(0.01)
(uci) Tariff		(45-2	()Tariff		
(42)	IntraLata/		-	IntraLata/		
No. of Minutes	s Day* /	Amount	No. of Minutes	'Qay*	Amount	
***************************************			***************************************			
0.			0.			0.00
0.			0.			0.00
0.			0.			0.00
0.		3 0.10	0.			0.00
0.			0.			0.00
· 0.			0.			0.00
0.			· 0.	9 0.163	1 0.15	0.00
	1 0.168			1 0.163	0.16	(0.01)
	.1 0.168		1.	.1 0.163°	1 0.18	(0.01)
	.2 0.168		1.	2 0.163°	0.20	0.00
1.	.3 0.168	3 0.22	1	3 0.163°	1 0.21	(0.01)
	.4 0.168		1.			(0.01)
	.5 0.168	3 0.25	1	.5 0.163°		(0.01)
	.6 0.168	3 0.27		6 0.163		(0.01)
	.7 0.168	3 0.29		7 0.163		(0.01)
	.8 0.168	3 0.30		8 0.163		(0.01)
1	.9 0.168	3 0.32		.9 0.163		(0.01)
ı	2 0.168			2 0.163		(0.01)
					_	

* Blended tariff rate calculated by the company based on the tariff filed with the Commission as follows: (1st 18 second ant) plus (additional 5 second tariff times 7) = blended rate.

Calculation of blended rates are on the next schedule. Calculation of blendard rates are on the next school ula

000285

COMPANY:

TITLE:

MCI WORLDCOM COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

SERVICE.

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 DECEMBER 12, 1999

DATE: AUDITOR:

1.7 1.8

1.9

0.1535

0.1535

0.1535

RKY

3	V _C			TO SWITCH	ED TARIFF FOR	VNET]	•
` ~	<u>چې</u>)		IIIOCODEO	<u> </u>			J	
\'		July 1, 1998	Ĭ		(Signal)	Oct 1, 1998	Ŋ	
	, (Tariff			\smile	ariff		
	No. of Minutes	InterLata/	Amount		No. of Minutes	InterLata/ Off-Peak*	Amount	
	140. Of Williages	OII-F Gak	Amount					
	0.3				0.3			0.00
	0.4				0.4			(0.01)
	0.5				0.5			0.00
	0.6				0.6			0.00
	0.7				0.7			0.00
	0.8	0.1892			0.8			0.00
	0.9	0.1892			0.9			0.00
	1	0.1892			1			(0.01)
	1.1	0.1892			1.1			(0.01)
	1.2	0.1892	0.23		1.2			(0.01)
	1.3	0.1892	0.25		1.3			(0.01)
	1.4	0.1892	0.26		1.4			0.00
	1.5				1.5			0.00
	1.6				1.6	0.1834		(0.01)
	1.7				1.7	0.1834		(0.01)
	1.8				1.8	0.1834	0.33	(0.01)
	1.9				1.9	0.1834		(0.01)
	`				<u> </u>			(0.01)
4	\sim \sim	0.1002	0.00		142			• •
	\sim)				16-71			,
		Tariff			(32.7	(Tariff)		•
		IntraLata/				IntraLata/		
	No. Of Minutes		Amount		No. Of Minutes	Off-peak*	Amount	
		On pour						
	0.3	0.1535	0.05		0.3			(0.01)
	0.4				0.4			0.00
	0.5	0.1535	0.08		0.5	0.1493		(0.01)
	0.6	0.1535	0.09		0.6			0.00
	0.7	0.1535	0.11		0.7			(0.01)
	0.8	0.1535	0.12		0.8			0.00
	0.9	0.1535	0.14		0.8	0.1493		(0.01)
	1	0.1535	0.15		1			0.00
	1,1				1.1	0.1493		(0.01)
	1.2				1.2	0.1493		0.00
	1.3				1.3			(0.01)
	1.4				1.4			0.00
	1.5				1.5			(0.01)
	1.6				1.6			(0.01)
	1.7				1.7			(0.01)
	,,, 1.9				1.6			(0.01)

^{*} Blended tariff rate calculated by the company based on the tariff filed with the Commission as follows: (1st 18 second amt) plus (additional 6 eccond tariff times 7) - blended rate. Calculation of blended rates are on the next schedule.

0.28

0.29

0.31

Jea 45-1 4 45-1

0.27

0.28

MARINESTIA

0.1493

0.1493

0.1493

1.8

000286

(0.01) (0.01) (0.01)

COMPANY:

MCI WORLDCOM

TITLE:

COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

SERVICE.

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 DECEMBER 12, 1999

DATE:

AUDITOR:

RKY

SWITCHED - DEDIC ATED TARIFF FOR VNET

110	OV	VII CHED - DED	EDIC ATED TAKIFF FOR VIVET						
	uly 1, 1998 anff) nterLata/	nount	No. of Minutes	Oct 1, 1998 Tariff InterLata/ Day*	Amount				
0.3	0.1463	0.04	0.3		0.0				
0.4	0.1463	0.06	0.4	0.1417	0.0				
0.5	0.1463	0.07	0.5		0.0				

				, , , , , ,		
0.3	0.1463	0.04	0.3	0.1417	0.04	0.00
0.4	0.1463	0.06	0.4	0.1417	0.06	0.00
0.5	0.1463	0.07	0.5	0.1417	0.07	0.00
0.6	0.1463	0.09	0.6	0.1417	0.09	0.00
0.7	0.1463	0.10	0.7	0.1417	0.10	0.00
0.8	0.1463	0.12	8.0	0.1417	0.11	(0.01)
0.9	0.1463	0.13	0.9	0.1417	0.13	0.00
1	0.1463	0.15	1	0.1417	0.14	(0.01)
1.1	0.1463	0.16	1.1	0.1417	0.16	`0.00
1.2	0.1463	0.18	1.2	0.1417	0.17	(0.01)
1.3	0.1463	0.19	1.3	0.1417	0.18	(0.01)
1.4	0.1463	0.20	1.4	0.1417	0.20	`0.00
1.5	0.1463	0.22	1.5	0.1417	0.21	(0.01)
1.6	0.1463	0.23	1.6	0.1417	0.23	`0.00
1.7	0.1463	0.25	1.7	0.1417	0.24	(0.01)
1.8	0.1463	0.26	1.8	0.1417	0.26	`0.00
1.9	0.1463	0.28	1.9	0.1417	0.27	(0.01)
2	0.1463	0.29	2	0.1417	0.28	(0.01)

SWITCHED - DEDIC ATED TARIFF FOR VNET

July 1, 1998 Tariff IntraLata/

Oct 1, 1998 IntraLata/

No. of Minutes	Day*	Amount	No. of Minutes	Day*	Amount	
0.3	0.1479	0.04	0.3	0.1436	0.04	0.00
0.4	0.1479	0.06	0.4	0.1436	0.06	0.00
0.5	0.1479	0.07	0.5	0.1436	0.07	0.00
0.6	0.1479	0.09	0.6	0.1436	0.09	0.00
0.7	0.1479	0.10	0.7	0.1436	0.10	0.00
0.8	0.1479	0.12	0.8	0.1436	0.11	(0.01)
0.9	0.1479	0.13	0.9	0.1436		`0.00
1	0.1479	0.15	1	0.1436	0.14	(0.01)
1.1	0.1479	0.16	1.1	0.1436		0.00
1.2	0.1479	0.18	1.2			(0.01)
1.3	0.1479	0.19	1.3			`0.00
1.4	0.1479	0.21	1.4			(0.01)
1.5	0.1479	0.22	1.5			0.00
1.6	0.1479	0.24	1.6			(0.01)
1.7	0.1479	0.25	1.7			(0.01)
1.8		0.27	1.8			(0.01)
'1.9	0.1479	0.28	1.9		0.27	(0.01)
2	0.1479	0.30	2		0.29	(0.01)

*Blended tariff rate calculated by the company based on the tariff filed with the Gommission.

Difference

COMPANY:

TITLE:

MCI WORLDCOM COMPARISON OF JULY 1, 1998 REDUCTION TO OCTOBER 1, 1998 REDUCTION FOR VNET BUSINESS

SERVICE.

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 DECEMBER 12, 1999

DATE: AUDITOR:

RKY

		SWITCHED	- DEDIC ATED TARIFF FOR VI	VET]	
	July 1, 1998	3	(ED)	Oct 1, 1998	2	,
)	Tariff			Tariff		
No of Minutes	InterLata/	Amount	No. of Minutes	InterLata/	A	
No. of Minutes	Off-Peak*	Amount	No. of Minutes	Off-Peak*	Amount	
0.3			0.3	0.1116	0.03	0.00
0.4	0.1150	0.05	0.4	0.1116		(0.01)
0.5	0.1150	0.06	0.5	0.1116		0.00
0.6	0.1150	0.07	0.6	0.1116		0.00
0.7	0.1150	0.08	0.7	0.1116		0.00
8.0	0.1150	0.09	8.0	0.1116		0.00
0.9	0.1150	0.10	0.9	0.1116		0.00
1	0.1150	0.12	1	0.1116		(0.01)
1.1	0.1150	0.13	1.1	0.1116		(0.01)
1.2	0.1150	0.14	1.2	0.1116		(0.01)
1.3	0.1150	0.15	1.3			0.00
1.4	0.1150	0.16	1.4	0.1116		0.00
1.5	0.1150	0.17	1.5			0.00
1.6	0.1150	0.18	1.6			0.00
1.7	0.1150	0.20		0.1116		(0.01)
1.8			1.8			(0.01)
1.9			1.9			(0.01)
2	0.1150		2	0.1116		(0.01)
						(1/

45-		SWITCHED .	DEDIC ATED TARIFF FOR V	NET]	
No. Of Minutes	Tariff IntraLata/ Off-peak*	Amount	No. Of Minutes	Tariff IntraLata/ Off-peak*	Amount	
0.3	0.1163	0.03	0.3	0.1126	0.03	0.00
0.4		0.05	0.4			0.00
0.5		0.06	0.5			0.00
0.6	0.1163		0.6	0.1126	0.07	0.00
0.7	0.1163	0.08	0.7	0.1126	0.08	. 0.00
8.0			0.8	0.1126	0.09	0.00
0.9	0.1163	0.10	0.9	0.1126	0.10	0.00
. 1	0.1163		1	0.1126	0.11	(0.01)
1.1	0.1163	0.13	1.1	0.1126		(0.01)
1.2		0.14	1.2			0.00
1.3		0.15	1.3			0.00
1.4		0.16	1.4			0.00
1.5		0.17	1.5			0.00
1.6		0.19	1.6			(0.01)
1.7	0.1163	0.20	1.7			(0.01)
1.8			1.8			(0.01)
1.9		0.22	1.9			(0.01)
2	0.1163	0.23	2	0.1126	0.23	0.00

*Blended tariff rate calculated by the company based on the tariff filed with the Commission.

Rge Percentage 2 Month or less JUN1998 JUL1998 AUG1998 SEP1998 **DEC1998** JAN1999 FEB1999 MAR1999 **APR1999** MAY1999 JUN1999 JUL1999 AUG1999 SEP1999 OCT1999 NOV1999 **DEC1999** Overall

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Law & Public Policy Six Concourse Parkway Suite 3200 Atlanta, GA 30328

January 12, 2000

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166-7602

RE: Follow Up To Request No. 14

Dear Ms. Young:

As follow up to Request No. 14 attached please find additional billing print screens for MCI WorldCom's Vnet Service. These print screens have been labeled to correspond to the applicable tariff pages for the 7/1/98 and 10/1/98 rate changes. Following is an explanation of each print screen:

57.4

7/1/98 Screens

Screens 1 & 4 — These rates correspond with Sheet 26.17 and Sheet 26.17.1 and are for switched to switched and card peak and off-peak calls. Screen 1 is interLATA and screen 4 is intraLATA.

Screens 2 & 5 - These rates correspond with 26.17 and Sheet 26.17.1 and are for switched to dedicated and dedicated to switched peak and off-peak calls. Screen 2 is interLATA and screen 5 is intraLATA.

(37.7) (27.7)

10/1/98 Screen

Screens 7 & 9. These rates correspond with Sheet 26.17 and Sheet 26.17.1 and are for switched to switched and card peak and off-peak calls. Screen 7 is interLATA and screen 9 is intraLATA.

Screen 8 & 10 - These rates correspond with 26.17 and Sheet 26.17.1 and are for switched to dedicated and dedicated to switched peak and off-peak calls. Screen 8 is interLATA and screen 10 is intraLATA.

Dedicated to Dedicated Screens

Screens 3 & 6 - These rates correspond with Sheet 26.17 and Sheet 26.17.1 and are for dedicated to dedicated peak and off-peak calls. Screen 3 is interLATA and screen 6 is intraLATA. These screens are applicable for both 7/1/98 and 10/1/98.

CONTILL 57-600290

January 12, 2000 Letter to Ms. Young Page Two

Screens 11-14

These screens were included in a previous package. Screen 11 corresponds to Screen 1. Note the "Per Minute View" box near the bottom of the left hand corner of the screen. Screen 1 is labeled "increment" and screen 11 is labeled "minute". These are sub screens of each other. Screen 1 shows the 18/6 second billing increments and Screen 11 shows a full minute rate for that 18/6 second rate. This verifies that the previous calculations performed against the customer invoices using the "minute" screens were accurate calculations. Screens 7 & 12 illustrate this as well.

Screens 13 and 14 were also included in a previous package. This screens were sent in error. They depict the rate for an operator assisted card call. Non-operator assisted card calls default to the switched to switched per minute rate [i.e., Screens 1, 4, 7, 9, 11, and 12] and are billed at 18/6 second increments. However, the print screen does not show this default, so the billing contact sent me the operator assisted card screens in error. All operator assisted calls bill in one minute increments.

The information provided in this package contains confidential information as defined in 364.183, 366.093, or 367.156 F.S.

Should you require additional information, please feel free to contact me at 800-759-3813.

Sincerely,

Julie/L. Davis

in L. Dan

Enclosures

000291

