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PERIOD: DATE: AUDITOR: TUSA LIST OF CONFIDENTIAL WORKPAPERS JULY 1, 1998; OCTOBER 1, 1998 MAY 17, 2000 RKY

NO. OF **PAGES** DESCRIPTION WP NO. 7 Report 1 4 Company Response to Req 1 & 2 44-4 1 Test of Invoices 45 4 Company Response to Req 1 & 2 45-1 8 **Print Screens** 45-2 3 Summary of % Reduction 46 5 Reduction Information 46-1 1 Reduction Information 46-1/1 1 % Reduction informaiton 46-1/2 4 Company Response to Req 1 & 2 46-2 2 Flow Through WorkSheet 7/98 46-3 2 Flow Through WorkSheet 10/98 46-4 1 IntraLata Revenue 46-5 Calculation of IntraLata Revenue 7/98 4 46-5/1-1 Calculation of IntraLata Revenue 7/98 3 46-5/1-2 4 Calculation of IntraLata Revenue 10/98 46-5/2 2 Calculation of IntraLata Revenue 10/98 46-5/2-1

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FPSC-RECORDS/REPORTING



# FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY OVERSIGHT BUREAU OF AUDITING SERVICES

Miami District Office

TELECOM\*USA
FLOW THROUGH OF SWITCHED ACCESS RATE REDUCTIONS
JULY 1, 1998
OCTOBER 1, 1998

UNDOCKETED AUDIT CONTROL NO. 00-077-4-1

Ruth K. Young, Audit Manager

Kathy L. Welch, Miami District

Audit Supervisor

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## DIVISION OF REGULATORY OVERSIGHT AUDITOR'S REPORT

July 5, 2000

# TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to audit the tariff changes of Telecom\*USA effective July 1, 1998 and October 1, 1998. We have applied procedures to determine if the reductions on the tariff were passed through to the customers, and to determine if the company's reduced per minute IntraLATA toll rates did not exceed the per minute intrastate switched access rate reductions.

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 the 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.

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## 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 amount were reconciled with the general ledger, and accounts were scanned for error or inconsistency.

Reviewed - The exhibit amount 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 substantiation documentation was examined.

General: Company data necessary to fulfill the purpose of this audit was not available. Our audit was restricted to company written representations to our document requests. Audit disclosures 1 and 2 detail the restrictions and representations.

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### AUDIT DISCLOSURE 1

SUBJECT: TEST OF INVOICES

STATEMENT OF FACTS: The company reported that it reduced two rate elements in July 1998 and the same in October 1998. These are First Choice and SuperWatts Plus. In order to determine if the company was following its reduced tariffs, billing information was requested for the months before and after the tariff reductions. The company stated that billing information for these two rate elements for that time period was no longer available.

However, the company was able to provide the print screens from the company billing system for First Choice. The print screens show the effective date and the rate which agree with the tariffs effective 7/1/98 and 10/1/98.

Although we did not have customer invoices to determine the effective date of the reduction to the customer, the company stated that for the 7/1/98 reduction, rates went into effect on July 28. For the 10/1/98 reduction, rates went into effect on 11/23/98.

For the difference in the effective dates and the dates billed to the customer, the company informed us that the "... credit for both tariff filings equaled only the first and impacted customers. This would result in roughly an arrest redit per customer. Due to the minimal amount of impact to the customer, the credit recovery process was not run for this particular impact".

**OPINION:** It could not be determined whether the customer was billed the reduced tariff rates effective July 1 and October 1, 1998 because of the lack of data. The credit due the customers as calculated by the company was not refunded.

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### **AUDIT DISCLOSURE 2**

SUBJECT: INTRASTATE SWITCHED ACCESS REDUCTION COMPARED WITH INTRALATA TOLL REDUCTION

STATEMENT OF FACTS: Order No. PSC-98-0795-FOF-TP required that Telcom\*USA reduce intrastate rates. The order also stated that an Interexchange Carrier shall not reduce per minute intraLATA toil rates by a percentage greater than the required per minute switched access rate reduction.

The company was asked to provide us with the following so that we could compare the per minutes intrastate switched access reduction with the per minute intraLATA toll reduction.

- 1. Data necessary to determine the annual switched access savings (access charge rate change times a study period intrastate minutes of use annualized).
- 2. Total intraLATA dollar reduction (estimated annual minutes of use times the tariff reduction).
- 3. Total intraLATA revenue (rate elements reduced times the rate in effect before the tariff reduction).

The company did not provide us with this information for Telecom\*USA. Instead the company responded as follows:

"Telecom\*USA was a subsidiary of MCI Telecommunications Corporation at the time of the access reductions and is a subsidiary of MCI WorldCom today. Neither MCI nor MCI WorldCom maintain this information separately for Telecom\*USA. Access information for both the former MCI Telecommunications corporation and Telecom\*USA are combined. As a result, the information reported on the MCI Telecommunications Corporation Flow Through Worksheets for Lines 1 through 6 (Page 4) included Telecom\*USA data." "...The calculations provided on the MCI worksheet (Page 5) were inclusive of the Telecom\*USA data."

The minutes of use in MCI's worksheets included Telecom\*USA minutes of use. However, the rate elements reduced by MCI Telecommunications Corporation to make up the switched access savings on the Interexchange Carrier Flow Through Work Sheets for both July and October 1998 reductions did not include any rate elements of Telecom\*USA.

But Telecom\*USA did reduce its tariff for First Choice and Super Watts Plus in July and October, 1998. The company representative stated that the rates for these rate elements are still in effect.

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OPINION: Since Telecom\*USA had its own certificate, it was required to reduce tariff elements even though it was not required to file an Interexhcange Carrier Flow Through Work Sheet because of its size. It appears that because MCI included the minutes of use of Telecom\*USA in its Interexchange Carrier Flow Through Work Sheet it overstated the reduction needed for MCI.

WC>KING PAPER STANDARD E acres Charges COST OF CAPITAL 31 COST OF CAPITAL 32 EQUITY LONG TEXM DEST SHORT TERM DEST DEFERRED TAXES TAX CREDITS **CURRENT FILES** ORIGINAL WORK PAPERS - FILE MAINTENANCE IN DIVISION AUDIT FINANCE CONTROL FILE **NET OPERATING INCOME** PLANNING AND CONTROL NET OPERATING INCOME I AUDIT REPORT OPERATING REVENUES COMPANY FILING MANAGEMENT REPRESENTATION LETTER Tariffs + Tarff Rebution 4 AUDIT SERVICE REQUEST S PLANNING AUDIT PROGRAM ANALYTICAL REVIEW REVIEW NOTES BOARD OF DIRECTORS LIST OF DIRECTORS AND AFFILIATES REVIEW NOTES EXTERNAL/INTERNAL/FPSC AUDIT MAINTENANCE EXPENSES DOCUMENT REQUESTS AND CONTROL LOG 11 CONFIDENTIAL DOCUMENTS CONTROL LOG DEPRECIATION / AMORTIZATION EXPENSES 51 TRIAL BALANCE ADJUSTMENT / RECLASSIFICATION SUMMARY TAXES OTHER THAN INCOME SUPERVISORS REVIEW OF AUDIT INCOME TAXES DEFERRED TAXES RATE BASE GAINES / LOSS DISPOSAL UTILITY PLANT IS RATE BASE UTILITY PLANT 17 LAND MANT HELD FOR PUTURE USE CONSTRUCTION WORK IN PROCESS: OTHER INCOME CONTRIBUTIONS IN AID OF CONSTRUCTION OPERATING INCOME ALLOWANCE FOR FUNDS USED DURING CONST. ACCUMULATED DEPRECIATION ACCUMULATED AMORTIZATION OF CIAC TAXES WORKING CAPITAL 63 INTERST CHARGES EXTRAORDINARY ITEMS

LAW & FUBLIC POLICY Six Concourse Parkway Suite 3200 Atlanta, GA 30328

April 18, 2000

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

RE: Telecom\*USA Audit Request 1 and Request 2

Dear Ms. Young:

In response to verbal Request 1 for the Telecom\*USA flow through audit, on March 27, 2000, you received copies of actual tariff filings, a copy of the letter certifying Telecom\*USA paid less than \$20 million in access charges in 1997, and copies of prior and subsequent revisions to the tariff pages impacted in these flow throughs.

The following responses are being provided to further clarify the information listed in written Request 1.

1. Provide the names of the rate elements reduced for the July 1, 1998 and October 1, 1998 reduction.

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RESPONSE: Both the 7/1/98 and 10/1/98 Telecom\*USA flow through tariff filings impacted the First Choice intraLATA per minute usage rates and the SuperWATS Plus intrastate per minute usage rates.

2. Provide the actual date the reductions went into effect.



RESPONSE: For the 7/1/98 reduction, rates went into production on 7/28/98. For the 10/1/98 reduction, rates went into production on 11/23/98.

- 3. Provide a list of the customers for each rate element in (1) above for the following time periods:
  - A. Two months before the July 1, 1998 reduction went into effect.
  - B. First month the reduction went into effect after the July 1, 1998 reduction.
  - C. First month the reduction went into effect after the October 1, 1998 reduction.



Letter to Ms. Young April 18, 2000 Page Two

3. Continued

RESPONSE: We are currently researching this information. Due to the fact that these rate actions took place approximately two years previous, it is difficult to readily obtain this information. Additional information will be provided in a subsequent response, but at this time it is not possible to estimate a timeframe for the response.

4. Provide the date the credit was given to the customers for the late effective dates of the tariff reductions for all rate elements involved.

RESPONSE: The total amount of the credit for both tariff filings equaled and impacted customers. This would result in roughly an \$3 edit per customer. Due to the minimal amount of impact to the customer, the credit recovery process was not run for this particular impact. However, these rate elements have remained constant since October 1998, thus customers have received the full benefit of this reduction for more than the twelve month flow through period.

5. Provide a list of customers for all rate elements at the time the credit was given.

RESPONSE: Due to the response given for Number 4 above, this information will not be provided.

The following is provided in response to Request 2:

If the company prepared a calculation as found on page 4, lines 1 through 6, provide the calculation for both July 1, 1998 and October 1, 1998. Note the study periods used for the Minutes of Use. Provide supporting documentation for the study period Minutes of Use; for example invoices from the Local Exchange Company, company minutes of use data, revenue data, or other documentation. Also, provide documentation for the Statewide intrastate long distance study period billable revenue. 000010

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Letter to Ms. Young April 18, 2000 Page Three

## Request 2 A continued:

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If the company did not prepare a calculation, provide the information necessary to fill out lines one through six on Page 4 using the same study time periods as you used for MCI. Provide the supporting documentation

RESPONSE: Telecom\*USA was a subsidiary of MCI
Telecommunications Corporation at the time of the access reductions and is a subsidiary of MCI WorldCom today.
Neither MCI nor MCI WorldCom maintain this information separately for Telecom\*USA. Access information for both the former MCI Telecommunications Corporation and Telecom\*USA are combined. As a result, the information reported on the MCI Telecommunications Corporation

-Flow Through Worksheets for Lines 1 through 6 included Telecom\*USA data. I have included copies of the MCI worksheets for both the July and October reductions.

B. If the company prepared a calculation as found on page 5, lines 1 and 2 inclusive of all subitems, provide the calculation for both July 1, 1998 and October 1,1998. Describe how you calculated lines 1.a. and 1.b.

If the company did not prepare a calculation, provide the information necessary to fill out lines 1 and 2 inclusive of all subitems on Page 5, using the same study time periods as you used for MCI. Provide how you calculated these line items.

RESPONSE: As stated above, because the company does not break out the MCI and Telecom\*USA access savings separately, it is not possible to determine the information identified on Page 5 individually for MCI vs. Telecom\*USA. The calculations provided on the MCI worksheet were inclusive of the Telecom\*USA data

C. (1) Provide the actual MOU for May 98 for GTE Originating and Terminating and for Sprint Interconnection.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data. The amount for GTE was actually calculated using March 1998 data and the Originating MOUs are and

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Letter to Ms. Young April 18, 2000 Page Four

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terminating are For Sprint interconnection the calculation was based on May 1998 and the amount is

(2) Provide statewide intrastate long distance billable revenue for May 98.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data. The total billable revenue for May 98 as reported on the MCI IXC Worksheet is \$\frac{1}{2}\text{Telecom\*USA}.

(3) Provide Total IntraLATA Revenue for May 98.

RESPONSE: This information is not available specifically for

Telecom\*USA, but rather is combined with the MCI data.

The total intraLATA revenue for May 98 as reported on the

MCI IXC Worksheet is \$

The responses provided in this letter contain confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom, on behalf of Telecom\*USA, appreciates your handling this matter as confidential.

Should you have any questions regarding this matter please don't hesitate to contact me at (800) 759-3813.

Sinegrely,

yfie L. Davis

Regulatory Manager

& Dank

Attachments

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## **AUDIT DISCLOSURE 2**

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SUBJECT: TEST OF INVOICES

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STATEMENT OF FACTS: The company reported that they reduced two rate elements in July 1998 and the same in October 1998. These are First Choice and SuperWatts Plus. In order to determine if the company was following their reduced tariffs, billing information was requested for the months before and after the tariff reductions. The company stated that billing information for these two rate elements for that time period was no longer available.

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However, the company was able to provide the print screens from the company billing system for First Choice. The print screens show the effective date and the rate which agree with the tariffs effective 7/1/98 and 10/1/98.

Although we did not have customer invoices to determine the effective date of the reduction to the customer, the company stated that for the 7/1/98 reduction, rates were into effect on July 28. For the 10/1/98 reduction, rates went into effect on 11/23/98.

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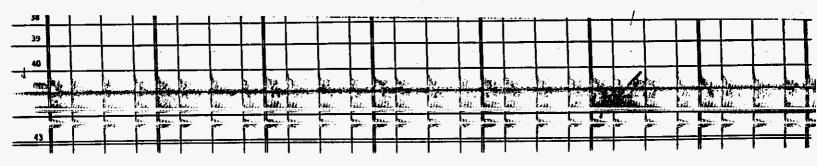
For the difference in the effective dates and the dates billed to the customer, the company informed us that the "... credit for both tariff filings equaled only states and impacted customers. This would result in roughly an \$ are credit per customer. Due to the minimal amount of impact to the customer, the credit recovery process was not run for this particular impact".

OPINION: It could not be determined whether the customer was billed the reduced tariff rates effective July 1 and October 1, 1998 because of the lack of data. The credit due the customers was not refunded.

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LAW & PUBLIC POLICY Six Concourse Parkway Suite 3200 Atlanta, GA 30328

April 18, 2000

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

RE: Telecom\*USA Audit Request 1 and Request 2

Dear Ms. Young:

In response to verbal Request 1 for the Telecom\*USA flow through audit, on March 27, 2000, you received copies of actual tariff filings, a copy of the letter certifying Telecom\*USA paid less than \$20 million in access charges in 1997, and copies of prior and subsequent revisions to the tariff pages impacted in these flow throughs.

The following responses are being provided to further clarify the information listed in written Request 1.

1. Provide the names of the rate elements reduced for the July 1, 1998 and October 1, 1998 reduction.

RESPONSE: Both the 7/1/98 and 10/1/98 Telecom\*USA flow through tariff filings impacted the First Choice intraLATA per minute usage rates and the SuperWATS Plus intrastate per minute usage rates.

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2. Provide the actual date the reductions went into effect.

RESPONSE: For the 7/1/98 reduction, rates went into production on 7/28/98. For the 10/1/98 reduction, rates went into production on 11/23/98.

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Provide a list of the customers for each rate element in (1) above for the following time periods:

- A. Two months before the July 1, 1998 reduction went into effect.
- B. First month the reduction went into effect after the July 1, 1998 reduction.
- C. First month the reduction went into effect after the October 1, 1998, reduction.

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Letter to Ms. Young April 18, 2000 Page Two

#### 3. Continued

RESPONSE: We are currently researching this information. Due to the fact that these rate actions took place approximately two years previous, it is difficult to readily obtain this information. Additional information will be provided in a subsequent response, but at this time it is not possible to estimate a timeframe for the response.

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Provide the date the credit was given to the customers for the late effective dates of the tariff reductions for all rate elements involved.

RESPONSE: The total amount of the credit for both tariff filings equaled nd impacted ustomers. This would result in roughly an \$ edit per customer. Due to the minimal amount of impact to the customer, the credit recovery process was not run for this particular impact. However, these rate elements have remained constant since October 1998, thus customers have received the full benefit of this reduction for more than the twelve month flow through period.

Provide a list of customers for all rate elements at the time the credit was 5. 43 given.

> RESPONSE: Due to the response given for Number 4 above, this information will not be provided.

The following is provided in response to Request 2:

If the company prepared a calculation as found on page 4, lines 1 through 46 6, provide the calculation for both July 1, 1998 and October 1, 1998. Note the study periods used for the Minutes of Use. Provide supporting documentation for the study period Minutes of Use; for example invoices from the Local Exchange Company, company minutes of use data, revenue data, or other documentation. Also, provide documentation for the Statewide intrastate long distance study period billable revenue.

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Letter to Ms. Young April 18, 2000 Page Three

## Request 2 A continued:

If the company did not prepare a calculation, provide the information necessary to fill out lines one through six on Page 4 using the same study time periods as you used for MCI. Provide the supporting documentation

RESPONSE: Telecom\*USA was a subsidiary of MCI

Telecommunications Corporation at the time of the access reductions and is a subsidiary of MCI WorldCom today. Neither MCI nor MCI WorldCom maintain this information separately for Telecom\*USA. Access information for both the former MCI Telecommunications Corporation and Telecom\*USA are combined. As a result, the information reported on the MCI Telecommunications Corporation—Flow Through Worksheets for Lines 1 through 6 included Telecom\*USA data. I have included copies of the MCI worksheets for both the July and October reductions.

B. If the company prepared a calculation as found on page 5, lines 1 and 2 inclusive of all subitems, provide the calculation for both July 1, 1998 and October 1,1998. Describe how you calculated lines 1.a. and 1.b.

If the company did not prepare a calculation, provide the information necessary to fill out lines 1 and 2 inclusive of all subitems on Page 5, using the same study time periods as you used for MCI. Provide how you calculated these line items.

RESPONSE: As stated above, because the company does not break out the MCI and Telecom\*USA access savings separately, it is not possible to determine the information identified on Page 5 individually for MCI vs. Telecom\*USA. The calculations provided on the MCI worksheet were inclusive of the Telecom\*USA data

C. (1) Provide the actual MOU for May 98 for GTE Originating and Terminating and for Sprint Interconnection.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data.

The amount for GTE was actually calculated using March 1998 data and the Originating MOUs are and

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Letter to Ms. Young April 18, 2000 Page Four

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Provide statewide intrastate long distance billable revenue for May 98.

RESPONSE: This mformation is not available specifically for Telecom\*USA, but rather is combined with the MCI data. The total billable revenue for May 98 as reported on the MCI IXC Worksheet is \$

 $\psi$  (3) Provide Total IntraLATA Revenue for May 98.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data.

The total intraLATA revenue for May 98 as reported on the MCI IXC Worksheet is \$

The responses provided in this letter contain confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom, on behalf of Telecom\*USA, appreciates your handling this matter as confidential.

Should you have any questions regarding this matter please don't hesitate to contact me at (800) 759-3813.

Sinegrely,

Julie L. Davis

Kegulatory Manager

alu L. Dans

Attachments

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LAW & PUBLIC POLICY Six Concourse Parkway Suite 3200 Atlanta, GA 30328

May 5, 2000

Ruth Young Miami District Office Florida Public Service Commission 3625 NW 82 Avenue, Suite 400 Miami, FL 33166 7502

RE: Telecom\*USA Audit Request 2

Dear Ms. Young:

The following information is provided in response to Request 2 Item 3 which requested customer information for the purpose of verifying the July and October 1998 flow throughs. As discussed in our phone conversation, the SuperWATS Plus product has been "decommissioned" meaning that the service no longer exists and there are no customers on it. As a result, there are no records for this service. First Choice is still present in our billing system; however, no customer records date back to 1998. So, again there are no records for this service. To verify that the First Choice rates were placed in the billing system effective July 1, 1998 and October 1, 1998, I am enclosing print screens from our in-house billing system.

The responses provided in this letter contain confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom, on behalf of Telecom\*USA, appreciates your handling this matter as confidential.

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

Sincerely,

Julie/L. Davis

Regulatory Manager

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**Enclosures** 

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Sheet 21 - attached

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7/1/98 Night/Weekend rates discounted 50% per Section 4.1.6.B 4th Revised Sheet 21-attached

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10/1/98 Evening rates discounted 30%

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INQUIRY ON PRODUCTION RATE TABLE ONLY

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'FECTIVE DATE: 10011998

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Night Weekend rates discounted 16/1/98

T

REPLACES THIRD REVISED SHEET 21

SOUTHERNNET, INC. D/B/A TELECOM\*USA SOUTHERNNET, INC. D/B/A TELECONNECT

SPECIALIZED COMMON CARRIER SERVICE

SECTION 4 - RATES (Continued) FIRST CHOICE SERVICE (Continued)

.1 RATES FOR FIRST CHOICE SERVICE (Continued)
4.1.5 For example, the distance between Miami, Florida, and New York, New York, is calculated as follows:

 Wiami
 8,351
 527

 New York
 4,997
 1,406

 Take Difference
 3,354
 -879

Square and add: 11,249,316 + 772,641 =12,021,957 Divide by 10 and round: 12,021,957/10 = 1,202,195.7 = 1,202,196

Take square root and round 1,202,196 = 1096.4469 = 1097 miles

- 4.1.6 The rates for First Choice are subject to the following time-of-day and day-of-the-week discount:
  - 4.1.6.A. An Evening Discount applies to a call originating at a time from 5:00PM to, but not including 11:00PM on Sunday through Friday. New Year's Day, July 4, Labor Day, Thanksgiving Day and Christmas Day. The evening discount reduces the stated rates by thirty percent (30%).
    - 4.1.6.B. A night and weekend discount applies to a call originating at a time from 11:00PM to, but not including, 8:00AM on Monday through Friday. The night and weekend discount also applies to a call originating on Sunday until 5:00PM and all day on Saturday. The night and weekend discount reduces the stated rates by fifty percent (50%).
    - 4.1.6.C. All times in Paragraph 4.1.6.A. and 4.1.6.B. refer to local time in the area in the customer's home area.
    - 4.1.6.D. When a call is established in one time of day rate application period and ends in another, the rate in effect in each rate application period applies to the portion of the call occurring within that rate application period.

Issued: NOV 1 3 1995 Effective: JAN 2 6 1996

3y: Julie L. Davis, Tariff Administrator 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

**COMPANY:** 

TELECOM\*USA

TITLE:

**%RATE REDUCTION** 

PERIOD:

**JULY AND OCTOBER 1, 1998** 

DATE:

MAY 15, 2000

**AUDITOR:** 

**RKY** 

WP NO.

46

The analyst wanted us to make sure that Telecom\*USA reduced per minute intraLata toll rates did not exceed per minute intrastate switched access rate reductions.

To do this, we need the same information as filed with the Commission by MCI Telecommunications on the IXC Flow through work sheet for July and Oct 98. The information is detailed on 46-1 pages 4 and 5.

The company replied that Telecom\*USA data was already included in the MCI data submitted to the Commission on the IXC Flow Through Work Sheets for July and Oct 98. 46-2, 46-3 and 46-4.

Conclusions to be drawn from this are on the disclosure and are on WP46 pages 2 & 3.

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## **AUDIT DISCLOSURE 2**

SUBJECT: INTRASTATE SWITCHED ACCESS REDUCTION COMPARED WITH INTRALATA TOLL REDUCTION

STATEMENT OF FACTS: Order No. PSC-98-0795-FOF-TP required that Telcom\*USA reduce intrastate rates. The order also stated that an Interexchange Carrier shall not reduce per minute intraLATA toll rates by a percentage greater than the required per minute switched access rate reduction.

The company was asked to provide us with the following so that we could compare the per minutes intrastate switched access reduction with the per minute intraLATA toll reduction.

1. Data necessary to determine the annual switched access savings (access charge rate change times a study period intrastate minutes of use annualized).

2. Total intraLATA dollar reduction (estimated annual minutes of use times the tariff reduction).

3. Total intraLATA revenue (rate elements reduced times the rate in effect before the tariff reduction).

The company did not provide us with this information for Telecom\*USA. Instead the company responded as follows:

"Telecom\*USA was a subsidiary of MCI Telecommunications Corporation at the time of the access reductions and is a subsidiary of MCI WorldCom today. Neither MCI nor MCI WorldCom maintain this information separately for Telecom\*USA. Access information for both the former MCI Telecommunications corporation and Telecom\*USA are combined. As a result, the information reported on the MCI Telecommunications Corporation Flow Through Worksheets for Lines 1 through 6 (Page 4) included Telecom\*USA data." "...The calculations provided on the MCI worksheet (Page 5) were inclusive of the Telecom\*USA data."

The minutes of use in MCI's worksheets included Telecom\*USA minutes of use. However, the rate elements reduced by MCI Telecommunications Corporation to make up the switched access savings on the Interexchange Carrier Flow Through Work Sheets for both July and October 1998 reductions did not include any rate elements of Telecom\*USA.

SBut Telecom\*USA did reduce its tariff for First Choice and Super Watts Plus in July and October, 1998.

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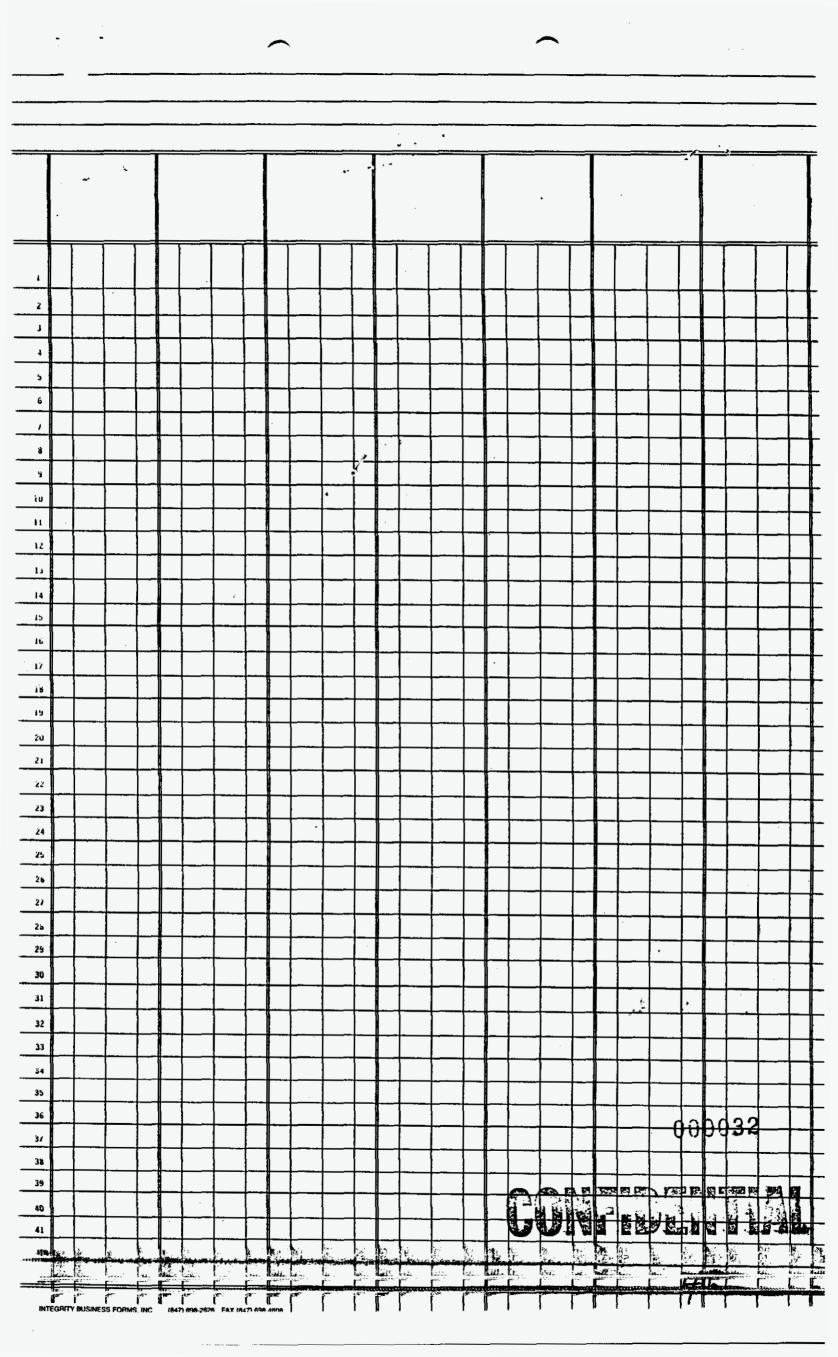
OPINION: Since Telecom\*USA had its own certificate, it was required to reduce tariff elements even though it was not required to file an Interexhcange Carrier Flow Through Work Sheet because of its size. It appears that because MCI included the minutes of use of Telecom\*USA in its Interexchange Carrier Flow Through Work Sheet it overstated the reduction needed for MCI.

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46/3/3





# 00003

## STATE OF FLORIDA

Commissioners:
Julia L. Johnson, Chairman
J. Terry Deason
Susan F. Clark
Joe Garcia
E. Leon Jacobs, Jr.



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

# Public Service Commission

June 11, 1998

TO:

Facilities-Based and Reseller Interexchange Carriers

FROM:

Walter D'Haeseleer, Director of Communications

RE:

Docket No. 980459-TP - July 1, 1998 Flow-Through of 1998 LEC Switched Access

Reductions by IXCs Pursuant to Section 364.163(6), Florida Statutes

Section 364.163(6), Florida Statutes, was recently amended by Chapter 98-277, Section 4, General Laws of Florida. This section requires GTE Florida and Sprint-Florida to make two reductions in their intrastate switched access rates in 1998: 5 percent effective July 1, 1998, and 10 percent effective October 1, 1998. This section also requires that any interexchange telecommunications company (IXC) whose intrastate switched access expense is reduced because of GTE Florida's and Sprint-Florida's intrastate switched access rate reductions must return the benefits of those reductions to its customers, i.e., "flow-through" the reduction to intrastate long distance customer rates. IXC flow-through reductions are to be effective July 1, 1998, and October 1, 1998. For the July 1, 1998 reduction, IXC tariffs are to be filed no later than June 30, 1998, to be effective July 1, 1998. For the October 1, 1998 reduction, IXC tariffs are to be filed no later that September 30, 1998, to be effective October 1, 1998.

If you do not purchase intrastate switched access from GTE Florida or Sprint-Florida, there are no flow-through reductions for you to make. In order to be in compliance with the law, you must, however, certify in a letter that you do not purchase intrastate switched access from GTE Florida or Sprint-Florida.

If you do purchase intrastate switched access from GTE Florida or Sprint-Florida, and your total intrastate expense reduction (GTE Florida plus Sprint-Florida) is \$100 or less per month, you do not need to flow through the intrastate expense reduction. In order to be in compliance with the law, you must, however, certify in a letter that your intrastate switched access expense reduction is \$100 or less per month.

If you purchase intrastate switched access from GTE Florida or Sprint-Florida, and your intrastate expense reduction is more than \$100 per month you must flow through the entire intrastate expense reduction to your intrastate long distance residence and business rates.

Facilities-Based and Reseller Interexchange Carriers
Page 2
June 11, 1998

Section 364.163(6), Florida Statutes specifies three flow-requirements:

- 1. An IXC's intrastate rates must be decreased by the amount necessary to return the benefits of the switched access reduction to its customers.
- 2. An IXC shall not reduce per minute intraLATA toll rates by a percentage greater than the required per minute switched access rate reduction.
- 3. An IXC may determine the specific rates to be decreased, provided that both residential and business customers benefit from the rate decreases.

Order No. PSC-98-0795-FOF-TP (Order), issued June 8, 1998, describes which IXCs must file documentation with the tariff filings, and what that documentation must contain. The complete order is available on the PSC Website (www2.scri.net/psc/dockets/documents/06113-98.html).

Any IXC which paid less than \$20 million in total Florida intrastate switched access in 1997 need only certify in a letter accompanying its tariff filing that, first, it paid less than \$20 million in total Florida intrastate switched access in 1997, and second, that it has met the statutory requirements. Sample worksheets are attached to provide guidance in determining that an IXC has met the statutory requirements. These worksheets have been updated with the actual rate changes from GTE Florida and Sprint-Florida, thus, they differ from the ones provided in the Order.

IXCs which paid \$20 million or more in total Florida intrastate switched access in 1997 must file documentation with their tariff filings. Sample worksheets are attached to serve as a guide for the required documentation. These worksheets have been updated with the actual rate changes from GTE Florida and Sprint-Florida, thus, they differ from the ones provided in the Order. This documentation must include:

- 1. A calculation of the dollar benefit associated with the LECs' intrastate switched access rate reductions.
- 2. Separate demonstrations that residence and business long distance rates have been reduced and the estimated annualized revenue effect, residence versus business, including a description of how those estimates were made.
- 3. A demonstration that any reduction to intraLATA toll rates is equal to or less than the switched access rate reduction percentage.

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Facilities-Based and Reseller Interexchange Carriers

Page 3

June 11, 1998

4. A demonstration that all reductions have been flowed through.

Tariffs are to be filed no later than June 30, 1998, to be effective on July 1, 1998.

To aid you in your calculations, the chart below provides the rate elements for GTE Florida and Sprint-Florida that will change on July 1, 1998. The chart includes the current rates, the July 1, 1998 rates, and the rate changes.

LEC July 1, 1998 Intrastate Switched Access Rate Reductions

LEC	Rate Element	Current Per Minute Rate	July 1, 1998 Per Minute Rate	Rate Change
GTE Florida	Originating CCL	\$0.0224842	\$0.0202287	(\$0.0022555)
GTE Florida	Terminating CCL	\$0.0348342	\$0.0313373	(\$0.0034969)
Sprint-Florida	Interconnection	\$0.010016	\$0.007066	(\$0.002950)

If you have any questions, you may call Sue Ollila of my staff at (850) 413-6540 or e-mail her at sollila@psc.state.fl.us.

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Facilities-Based and Reseller Interexchange Carriers Page 4 June 11, 1998

### **IXC Flow-Through Worksheet**

Name of IXC	
Study Period	(one or more months in 1998):

### Calculation of \$ Savings and Percent Reduction

Study Period

			# Intrastate		
<b>LEC</b>	Rate Change	X	Minutes (MOUS)	=	Sw. Acc. Savings
1. GTE	\$0.0022555 (Orig. CCL)	x		==	-
<b>2.</b> .	\$0.0034969 (Term. CCL)	x		=	
3. Sprint	\$0.00295 (Interconnection)	x		=	
4. Total S	w. Acc. Savings (Sum lines	1-3)		==	
5. Statew	ide intrastate long distance				
study p	eriod billable revenue			=	
6. Requir	ed % reduction in IXC's FL	ntra-			
state lo	ng distance rates (line 4/line :	5)		=	

The percent reduction from line 6 may be applied across-the-board to all of the IXC's intrastate rates **OR** 

The study period savings may be applied to one or more rate elements such that they are passed through to your customers. An example is shown below. REMEMBER: THE % REDUCTION FOR INTRALATA TOLL RATES MUST NOT BE HIGHER THAN THE REDUCTION ON LINE 6

### **Example: Savings Spread Over Specific Rate Elements**

	IXC Rate		Study Period # Intrastate		Study Period	•
Rate Element	Change	X	Minutes (MOUs)	=	Reduction	
7. #1		x		=		
8. #2		x		=		
9. Study perio	d total reducti	on=line	7+line 8 =		<del></del>	

Study period rate reduction in line 9 must equal or exceed line 4's study period total savings.

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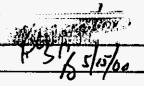
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### Facilities-Based and Reseller Interexchange Carriers Page 5 June 11, 1998

### **IXC Summary**

IXC:		•
Effective date of flow-through:		
Percentage Reduction of IntraLAT	A toll rates	
1. IntraLATA Toll Rate % Reduction		
a. Total IntraLATA Dollar Reduction*	=	
b. Total IntraLATA Revenue*	=	
c. Percent Reduction (line a/line b)	=	
2. LEC Percentage Switched Access Reduction	<b>=</b>	
(comes from IXC Flow-Through Worksheet, line 6)		
NOTE: Line 1c must be no greater than Line 2.		
Determination of Residence & Busines	ss Calculation	
Residential Description of how dollars calculated (e.g., rate elements include	ed, etc.):	
Business Description of how dollars calculated (e.g., rate elements include	led, etc.):	
IXC Flow-Through Summa	ary	
1. Annualized Effect* of Flow-Through to Residential Rates	<b>=</b>	
2. Annualized Effect* of Flow-Through to Business Rates:	=	
3. Total Annualized Flow-Through* (line 1+line 2)	=	

\*Describe how calculated



### Telecom \*USA...

PBC

780 Johnson Ferry Roud Suite 700 Atlanta, GA 30342

Walter D' Haeseleer
Director of Communications
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No 980459-TP – July 1, 1998
Flow-Through of 1998 LEC Access
Reductions by IXCs Pursuant to Section
364.163(6), Florida Statutes.
TelecomUSA Flow Through Tariff No.
T-98-0959

aska alkard

#### Dear Mr. D'Haeseleer:

In accordance with your memorandum to Facilities-Based and Reseller Interexchange Carriers dated June 11, 1998, I am certifying on behalf of TelecomUSA that it paid less than \$20 million in total Florida intrastate switched access in 1997 and that it has met the statutory requirements related to the GTE Florida and Sprint-Florida intrastate switched access reductions. The Telecom USA flow through rate reduction tariff (T-98-0959) was filed with the Commission on July 14, 1998 and the effective date is retroactive to July 1, 1998.

If you have any questions or require additional information, you may contact me at 800-283-6583.

Sincerely,

Marsha A. Ward Senior Counsel

Cc: Julie Davis

Rick Melson, Esquire

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COMPANY:
----------

TELCOM\*USA

TITLE:

**CALCULATION OF PERCENTAGE REDUCTION OF** 

**INTRALATA TOLL RATES** 

PERIOD:

**JULY 98** 

DATE:

OCTOBER 98

AUDITOR:

MAY 10, 2000 RKY

WP NO.

In order to determine the percent reduction of IntraLata toll rates, we need the following information:

fw 117/00

1

a. Total intra Lata Dollar Reduction (Formula is Annual MOU's times the tariff reduction )

No annual MOU's for Telcom USA for the rate elements that were reduced which are Frist Choice and Super Wats Plus Service.

The company says this information is included in the MCI Worldcom date and cannot separate it.

We know the percent reduction of the acutal tariffs on WP \_\_\_\_\_but cannot apply an estimate annual MOU's for these two rate elements.

### b. Total IntraLata Revenue

The company cannot separate Telcom USE IntraLata Revnue from MCI Worldcom. The total intraLata Annual Revenue according to the Company's IXC Flow Through Work Sheets is

for July and October 1, 1998 respectively.

From Information we have we can determine the monthly intralata percent of interstate billable revenue. See attached. However, we do not have enough information to use this.

### c. Percent Reduction

We need to above two to calculate this.

### 2. LEC Percentage Switched Access Reduction

Compare the percent in 1(c) to this.

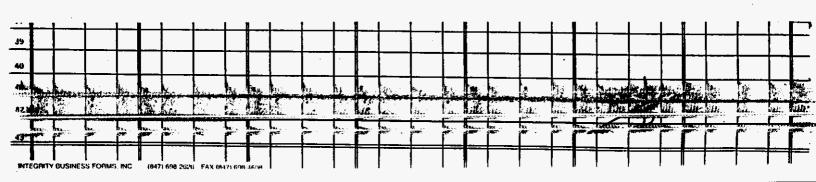
The company says that the Telcom USA information is included in the MCI WorldCom data submitted on the IXC worksheets.

It is not possible to determine the LEC Percentage Switch Access REduction forTelCom USA alone as the company cannot supply the data.

If you use all of MCI data to fill in the blanks on the IXC Worksheet, we still need to somehow calculate the Total intraLata dollar reduction on an annual basis. To do this we need the company estimated annual Minutes of Use for the two rate elements educed. We need to apply the tariff reductions to this.. Without having an the Esitmated Annual Minutes of Use for the two Rate Elements, we cannot calculate this.

Is there another way to calculate the reduction?

The second secon



### MCIWORLDCOM

LAW & PUBLIC POLICY Six Concourse Parkway Suite 3200 Atlanta, GA 30328

April 18, 2000

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

RE: Telecom\*USA Audit Request 1 and Request 2

Dear Ms. Young:

In response to verbal Request 1 for the Telecom\*USA flow through audit, on March 27, 2000, you received copies of actual tariff filings, a copy of the letter certifying Telecom\*USA paid less than \$20 million in access charges in 1997, and copies of prior and subsequent revisions to the tariff pages impacted in these flow throughs.

The following responses are being provided to further clarify the information listed in written Request 1.

1. Provide the names of the rate elements reduced for the July 1, 1998 and October 1, 1998 reduction.

RESPONSE: Both the 7/1/98 and 10/1/98 Telecom\*USA flow through

tariff filings impacted the First Choice intraLATA per minute usage rates and the SuperWATS Plus intrastate per

minute usage rates.

Provide the actual date the reductions went into effect.

RESPONSE: For the 7/1/98 reduction, rates went into production on

7/28/98. For the 10/1/98 reduction, rates went into

production on 11/23/98.

Provide a list of the customers for each rate element in (1) above for the following time periods:

A. Two months before the July 1, 1998 reduction went into effect.

B. First month the reduction went into effect after the July 1, 1998 reduction.

C. First month the reduction went into effect after the October 1, 1998 reduction.

he October 1, 1998 000041



2.

Letter to Ms. Young April 18, 2000 Page Two

### CONFIDENTIAL

3. Continued

7) RESPO

5.

RESPONSE: We are currently researching this information. Due to the fact that these rate actions took place approximately two years previous, it is difficult to readily obtain this information. Additional information will be provided in a subsequent response, but at this time it is not possible to estimate a timeframe for the response.

4. Provide the date the credit was given to the customers for the late effective dates of the tariff reductions for all rate elements involved.

RESPONSE: The total amount of the credit for both tariff filings equaled only \$ and impacted sustomers. This would result in roughly an \$ edit per customer. Due to the minimal amount of impact to the customer, the credit recovery process was not run for this particular impact. However, these rate elements have remained constant since October 1998, thus customers have received the full benefit of this reduction for more than the twelve month flow through period.

Provide a list of customers for all rate elements at the time the credit was given.

RESPONSE: Due to the response given for Number 4 above, this information will not be provided.

The following is provided in response to Request 2:

A. If the company prepared a calculation as found on page 4, lines 1 through 6, provide the calculation for both July 1, 1998 and October 1, 1998. Note the study periods used for the Minutes of Use. Provide supporting documentation for the study period Minutes of Use; for example invoices from the Local Exchange Company, company minutes of use data, revenue data, or other documentation. Also, provide documentation for the Statewide intrastate long distance study period billable revenue.

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46-2p2

Letter to Ms. Young April 18, 2000 Page Three

## INFIDENTIAL

### Request 2 A continued:

If the company did not prepare a calculation, provide the information necessary to fill out lines one through six on Page 4 using the same study time periods as you used for MCI. Provide the supporting documentation

RESPONSE: : elecom\*USA was a subsidiary of MCI Telecommunications Corporation at the time of the access reductions and is a subsidiary of MCI World Com today. Neither MCI nor MCI WorldCom maintain this information separately for Telecom\*USA. Access information for both the former MCI Telecommunications Corporation and Telecom\*USA are combined. As a result, the information reported on the MCI Telecommunications Corporation Flow Through Worksheets for Lines 1 through 6 included Telecom\*USA data. I have included copies of the MCI worksheets for both the July and October reductions.

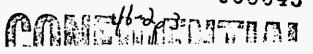
В. If the company prepared a calculation as found on page 5, lines 1 and 2 inclusive of all subitems, provide the calculation for both July 1, 1998 and October 1,1998. Describe how you calculated lines 1.a. and 1.b.

If the company did not prepare a calculation, provide the information necessary to fill out lines 1 and 2 inclusive of all subitems on Page 5, using the same study time periods as you used for MCI. Provide how you calculated these line items.

RESPONSE: As stated above, because the company does not break out the MCI and Telecom\*USA access savings separately, it is not possible to determine the information identified on Page 5 individually for MCI vs. Telecom\*USA. The calculations provided on the MCI worksheet were inclusive of the Telecom\*USA data

C. (1) Provide the actual MOU for May 98 for GTE Originating and Terminating and for Sprint Interconnection.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data. The amount for GTE was actually calculated using March 1998 data and the Originating MOUs are





Letter to Ms. Young April 18, 2000 Page Four

### CONFIDENTIAL

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terminating are For Sprint interconnection the calculation was based on May 1998 and the amount is

(2) Provide statewide intrastate long distance billable revenue for May 98.

RESPONSE: This information is not available specifically for Telecom\*USA, but rather is combined with the MCI data. The total billable revenue for May 98 as reported on the MCI IXC Worksheet is \$ 1

(3) Provide Total IntraLATA Revenue for May 98.

The responses provided in this letter contain confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom, on behalf of Telecom\*USA, appreciates your handling this matter as confidential.

Should you have any questions regarding this matter please don't hesitate to contact me at (800) 759-3813.

Sipeqrely,

fylie L. Davis Regulatory Manager

alu L. Dans

Attachments

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Name of IXC:

**MCI Telecommunications** 

FL 7-98



							<b>~</b> `		
		LEC	Rate	Change	×	Study Period # Intrastate Minutes (MOUS)	Monthly SW Access Savings	Annual SW Access Savings	
	1. 2.	GTE Orig CCL Term CCL		\$0.0022555 \$0.0034969	X	March 98 march 98			
	3.	Sprint	\$	0.00295	X	Was 38		\$	
	4.	Total Switched Access Sa	vings (Sum lines 1-3	)		·		5	
	5.	Statewide intrastate long of	istance study period	billable revenue	:	· •	\$		
	6.	Required % reduction in D	(C's FL intrastate lon	g distance rates	(lin	ne 4/line 5)			
		Rate Element	<u>Annual In</u>	trastate MOUs	X	IXC Rate Change	Annual Reduction		
	CONFIDENCE	Consumer Execunet Service interLATA intraLATA			x x		<b>(2)</b>	EA= 940,102.26	
/LN	<b>T</b>	MCI One Savings interLATA			×				>
ŕ	₽. ~	Small Business Preferred interLATA intraLATA			x x				
		Business Markets Vision interLATA intraLATA Vnet interLATA intraLATA 800 Service interLATA intraLATA	•		i i	Page 1	<ul><li>Ø</li><li>Ø</li><li>Ø</li></ul>		
						Page 1		- Line of the second	

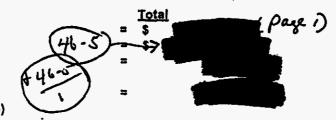
Page 1

Total

#### Percentage Reduction of IntraLATA Toll Rates



- 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)



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.

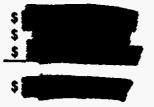
For Total intraLATA revenue the MOUs were multiplied by the new intraLATA tariffed rate.

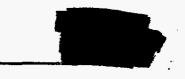
Each business units' (i.e., Residential, Small Business, and Business Markets) portion of the total reduction is calculated on a pro rata basis using the percentage of revenues for each business unit for the study period.



Business Markets Small Business Residential Total Study Period

Revenues

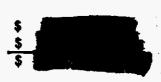




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IXC Flow Through Summary

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





<sup>\*</sup>see IXC Flow Through Worksheet

Name of IXC: Study Period:

MCI Telecommunications June, 1998 FL 10-98

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(BC

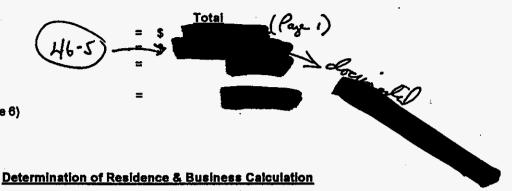
	LEC	Rate Change	x	Study Period # Intrastate Minutes (MOUS)	Monthly SW Access Savings	Annual SW Access Savings	•
1. 2.	GTE Orig CCL Term CCL	\$0.0042878 \$0.0066423					
3.	Sprint	\$ 0.005554	X				
4.	Total Switched Access Savings (Su	rm lines 1-3)					
5.	Statewide intrastate long distance s	tudy period billable revenue		may 98	\$		
6.	Required % reduction in IXC's FL in	trastate long distance rates	(line	·		•	
	Rate Element	Annual Intrastate MOUs	X	IXC Rate Change	Annual Reduction		
CONFIDENTIAL	Consumer Execunet Service interLATA intraLATA  MCI One Savings interLATA  Small Business Preferred interLATA		x x			E@: 51005-9	CONFIDENTION
000049	Business Markets  Vision interLATA intraLATA intraLATA intraLATA intraLATA intraLATA intraLATA intraLATA iretworkMCI One interLATA intraLATA intraLATA		x x x x	Page			

#### Percentage Reduction of IntraLATA Toll Rates

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- 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)

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



#### 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.)

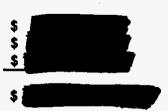
For lotal intraLATA dollar reduction, see IXC Flow Through Worksheet. These calculations include MOUs multiplied by the average change in the rate to obtain the total dollar reduction.

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.

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Business Markets Small Business Residential Total Study Period Revenues

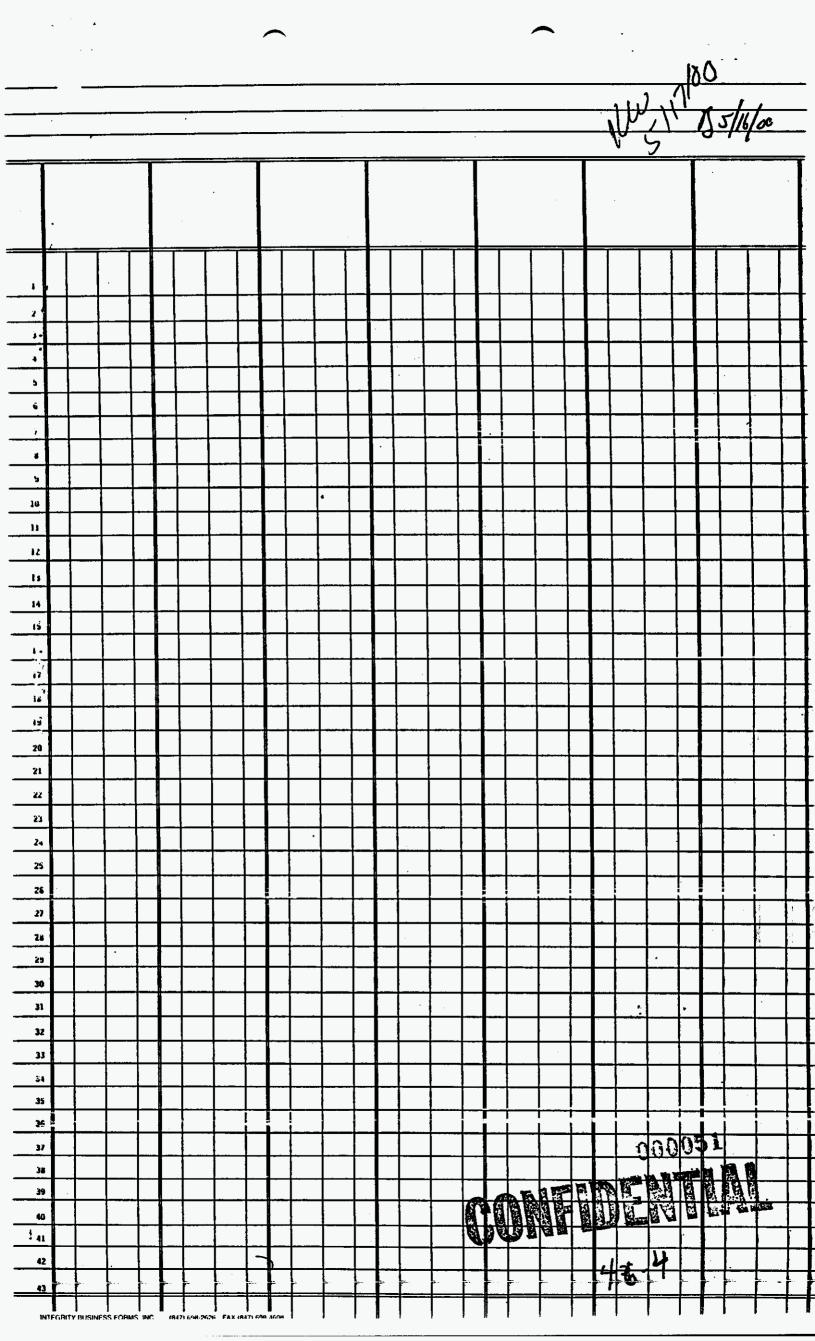




### **IXC Flow Through Summary**

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

\$ \$. \$



### CONFIDENTIAL





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

B

May 12, 2000

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

RE: Telecom\*USA Audit

Dear Ms. Young:

The following information is provided pursuant to your request regarding the calculation of item 1b. on page 2 of the 7/98 and 10/98 MCI Flow Through Worksheets.

Line 1b. was calculated by each business segment by multiplying the total intraLATA annual minutes by the existing tariffed rate for that service. Supporting worksheets have been provided as verification of these calculations. While researching this information it was discovered that the information reported in Line 1b of the 10/98 worksheet appears to be incorrect. The data provided as justification for the 10/98 worksheet indicates Line 1b should have been reported as \$ making Line 1c which is still within the 3.31% limit.

46-402

The responses provided in this letter and the enclosed documents contain confidential information as defined in 364.183, 366.093, or 367.156 F.S. MCI WorldCom, on behalf of Telecom\*USA, appreciates your handling this matter as confidential.

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

2 Jans

Sincerely,

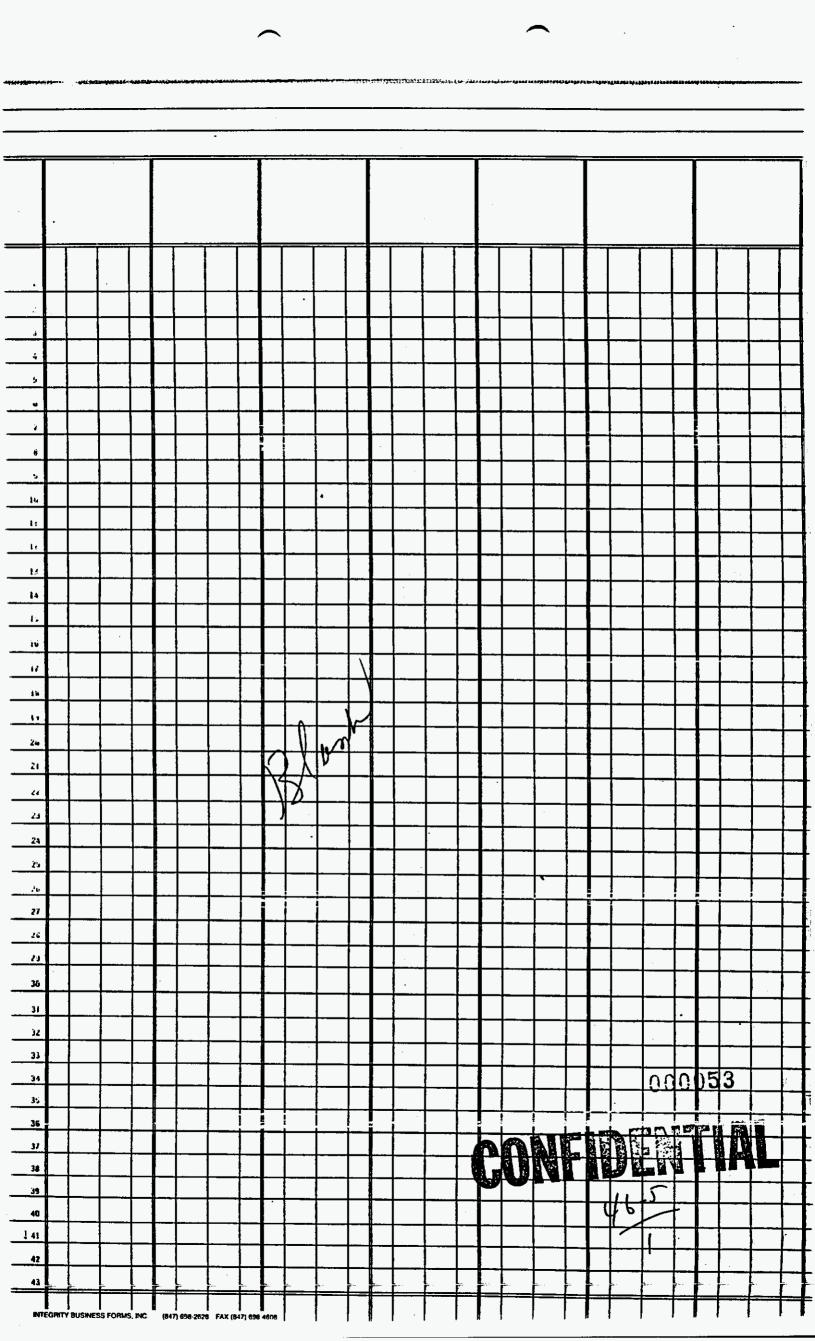
Julie L. Davis

Regulatory Manager

**Enclosures** 

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	•				New Rate per			•	•		
Vision - Outbound Interlata	<u>s</u>	W Peak 0.1881	Minutes*	Revenue Impact	<u>minute</u> 0.1835	% Change 2.45%					
IŅ (RALATA		0.1453			0.1421 <u>New Rate per</u>	2.20%			(	X)NHI)FNIIAI	
Vision - Outbound Interlata	<u>sw</u>	Off Peak 0.1505	Minutes*	Revenue Impact	<u>minute</u> 0.1468	% Change 2.45%			`		
INTRALATA		0.1162	1		0.1137	2.20%			•	•	
·					New Rate per				•		
Vision - Outbound	<u>DI</u>	ED Peak	Minutes*	Revenue Impact	<u>minute</u>	% Change					
Interlata	是	0.1169			0.1140	2.45%			•		
INTRALATA	_	0.1160			0.1134	2.20%					
Vision - Outbound		Off Peak	Minutes*	Revenue Impact	New Rate per minute	% Change					
Interlata	└ ~~	0.0935			0.0912	2.45%-					
INTRALATA	<b>=</b>	0.0928			0.0908	2.20%				•	
<b>!</b>	<b>&gt;</b>				New Rate per						
Vision - Card	5	Rate	Minutes*	Revenue Impact	minute	% Change					
NTRALATA		0.2186 0.2186			0.2132 0.2138	2.45% 2.20%					
		0.2100			New Rate per	2.20%					
Vision - Inbound	<u>s\</u>	N Peak	Minutes*	Revenue Impact	minute	% Change				•	
nterlata and Intralata		0.2098			0.2050	2.30%		•	· ,		
1/ision - Inbound	014	O# DI-	A constant		New Rate per		•	•	•		
Interlata and Intralata	SW	Off Peak 0.1678	Minutes*	Revenue Impact	<u>minute</u> 0.1640	% Change		•			
1					New Rate per	2.30%					
//ision - Inbound	DE	D Peak	Minutes*	Revenue Impact	minute	% Change					
interlata and Intralata		0.1357			0.1326	2.30%					
Misian - Inhaund	DEO	O#Deels	Minutest	B	New Rate per	-1 -1					
∤ision - inbound Interlata and Intralata	<u>080</u>	OffPeak	Minutes*	Revenue Impact	minute	% Change					
शास्त्रावाच चाात गामवाद्याव		0.1086			0.1061	2.30%					
					New Rate per						

% Change

0.00%

0.00%

% Change

0.00%

0.00%

New Rate per

Florida 7/98

NM1 (includes NM1 Card)

Interlata

NM1

Interlata

**ĮNTRALATA** 

INTRALATA

**Current Rates** 

<u>sw</u>

DED

0.1357

0.1077

0.0798

0.0798

Minutes\*

Minutes\*

Revenue Impact

Revenue Impact

minute

New Rate per

minute

0.1357

0.1077

0.0798

0.0798

				New Rate per					
PowerRate	<u>sw</u>	Minutes*	Revenue Impact	<u>minute</u>	% Change		-		•
Interlata	0.1721			0.1681	2.30%	•			
INTRALATA	0.1296	7	,	0.1270	2.00%		·		
				New Rate per	A/ 61				CONF
PowerRate	DED	Minutes*	Revenue Impact	<u>minute</u>	% Change				UUNT
Interlata	0.1042			0.1018	2.30%		•		•
INTRALATA	0.1000			0.0980 New Rate per	2.00%		•		
PowerRate Card	Card	Minutes*	Revenue Impact	minute	% Change				٠ ـ نر
Interiata	0.1721	Minutes	TIGVOTIOO IITIDACK	0.1681	2.30%				٠.
INTRALATA	0.1296			0.1270	2.00%			•	
	5255			57.275				•	
VNET SW-SW (VNET Card								New Rate per	
minutes included in SW-SW)	<u>1st 18</u>	Addtl 6	<u>Peak</u>	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	<u>minute</u>	% Change
interlata	0.0662	0.0221	0.2209			0.0646	0.0215	0.2154	2.50%
NTRALATA	0.0516	0.0172	0.1720			0.0505	0.0168	0.1683	2.15%
								New Rate per	ov ob
VNET SW-SW	<u>1st 18</u>	Addtl 6	Off Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	<u>minute</u>	% Change
interlata	0.0582	0.0194	0.1940			0.0568	0.0189	0.1892 0.1535	2.50% 2.15%
NTRALATA	0.0470	0.0157	0.1569			0.0461	0.0154	New Rate per	2.13%
VNET SW-DED	<u>1st 18</u>	Addtl 6	<u>Peak</u>	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	minute	% Change
nterlata	0.0451	0.0150	<u> </u>	Militales	Hevering impact	0.0439	0.0146	0.1463	2.50%
NTRALATA	0.0454	0.0151	0.1511			0.0444	0.0148	0.1479	2.15%
	****							New Rate per	
VNET SW-DED	1st 18	Addtl 6	Off Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	minute	% Change
Interlata	0.0353	0.0118	G.1 179			0.0345	0.0115	0.1150	2.50%
NTRALATA  VNET SW-DED Interlata INTRALATA  VNET SW-DED Interlata INTRALATA	0.0356	0.0119	0.1189			0.0349	0.0116	0.1163	2.15%
				•				New Rate per	
VNET DED -DED	<u>1st 18</u>	Addtl 6	<u>Peak</u>	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	<u>minute</u>	% Change
Interlata	0.0174	0.0058	6.0580			0.0174	0.0058	0.0580	0.00%
INTRALATA	0.0174	0.0058	0.0580			0.0174	0.0058	0.0580	0.00%
YNET DED -DED	4.40	م الله 4	Off Fleets	B. Aller James	Developed	Now tot 10	Now Addit 6	New Rate per minute	% Change
Interlata	<u>1st 18</u> 0.0124	Addtl 6 0.0041	Off Peak: 0.0411	Minutes*	Revenue Impaci	New 1st 18 0.0123	New Addtl 6 0.0041	0.0411	0.00%
NTRALATA	0.0124	0.0041	0.0411			0.0123	0.0041	0.0411	0.00%
Secondaria.	0.0124	0.0041	0.0411	<u></u>		0.0125	0.0071	•.••	0.00.0
								New Rate per	
TUSA SuperWats Plus Service 1	1st 30	Addtl 6	Day	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	minute	% Change
Interlata and Intralata	0.0678	0.0136	0.1358			0.0664	0.0133	0.1328	2.20%
₹:				)				New Rate per	
TUSA SuperWats Plus Service :	1st 30	Addtl 6	<u>Evening</u>	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	<u>minute</u>	% Change
interiata and intralata	0.0670	0.0114	0.1240			0.0607	0.0114	.0.1213	2.20%
					STATE OF THE STATE			New Rate per	
*USA SuperWats Plus Service •	1st 30	Addtl 6	Night	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	minute	% Change
Interlata and Intralata	0.0411	0.0082	0.0821			0.0402	0.0080	0.0803	2.20%
				1	Control of the contro	7			

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Stand Alone 800 DAL Interlata and Intralata	<u>Day</u> 0.1359 <u>Evening</u>	Minutes* Minutes*	Revenue Impact	New Rate per minute 0.1328 New Rate per minute	% Change 2.30%
Interlata and Intralata	0.1144			0.1118	2.30%
				New Rate per	
Stand Alone 800 DAL	Night/Weekend	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata and Intralata	0.0832	9		0.0813	2.30%
				New Rate per	
Stand Alone 800 CBL	<u>Day</u>	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata and Intralata	0.2254			0.2201	2.33%
				New Rate per	
Stand Alone 800 CBL	Evening	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata and Intralata	0.2186			0.2135	2.33%
				New Rate per	N Channe
Stand Alone 800 CBL	Night/Weekend	Minutes*	Revenue Impact	minute	% Change
Interiata and Intralata	0.2186			0.2135	2.33%
	<b>님=</b> .		B	New Rate per	e/ Ohanna
Stand Alone 800 WAL	Day	Minutes*	Revenue Impact	minute 0 1006	% Change 3.00%
interlata and intralata	<b>C</b> 0.1996			0.1936	3,00%
			Danis Impact	New Rate per	e/ Change
Stand Alone 800 WAL	Evening	Minutes*	Revenue Impact	<u>minute</u> 0.1393	<u>% Change</u> 3.00%
Interlata and Intralata	0.1436	4		*****	3.00%
	A.19 . 1 . 4.4.1	8.41AA	Onumus Impact	New Rate per	e Change
Stand Alone 800 WAL	Night/Weekend	Minutes*	Revenue Impact	<u>minute</u> 0.0991	% Change 3.00%
Interlata and Intralata	0.1022			0.0331	3.00%

Total MCI annual flowthrough amount BM percentage of annual FL revenue Total BM annual flowthrough amount Revenue Impact calculated Variance

Vision Minutes
Power Rate Minutes
NM1 Minutes
VNET Minutes
TUSA SuperWats Plus Service 1
SA800 Minutes
Total Minutes (sum of above)

Tetal Minutes



1-16

CONFIDENTIAL

7/98 Support

CONFIDENTIAL

### julie I. davis

From: Rent:

Diahna Williams [Diahna.Williams@mci.com]

Wednesday, August 19, 1998 6:05 PM

Julie L. Davis

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

Graves; Leslie Kerr, Jennifer Soder, Lana Williams

Subject:

Cc:

FLORIDA FLOW THROUGH version2.0

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 introlata reduction, as you will see the "total" intralata reduction is the MM would like to propose that BM make up the life rence. Following, is the FL Flow Through cost support.

Нелгу--

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

SB

Call with questions.

Thanks.

Diahna

unaudited

Percentage Reduction of IntraLATA Toll Rates

Consumer
1 IntraLATA Rate % Reduction

a.Total IntraLATA \$\$ Red.=

b. Total IntraLATA Rev.

c.Percent Reduction =

2 LEC Percentage Switched Access Reduction=

EXCEEDS REQUIREMENTS BY

BM

Total

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

COMPLETE COST SUPPORT

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

3B - Preferred ntralata

:========

46-5

000059

current

Day Night Eve \$.15 \$.13 \$.13

proposed

Day Eve **Night** \$0.1425 \$0.09 \$0.09

**Annual Minutes** 

Current New Difference Rate 0.1442 \$0.1273 (\$0.0169)

Net Revenue

SB - Preferred

Interlata

current

Eve Day Night \$.1800 \$.1525 \$.1500

proposed

Day

Eve

\$0.1300

\$0.1500

Night \$0.1300

**Annual Minutes** 

Current New **Difference** \$0.1717

Rate

Net Revenue

Residential Dial-1

IntraLATA

current

Day Eve Night

\$.12 \$.08 \$.08

proposed

Day

Eve

Night \$0.0800

\$0.1000

\$0.0800

**Annual Minutes** 

Current

New

Difference

Rate

\$0,0945

\$0.0872

(\$0.0072)

Net Revenue

Residential Dial-1

Interlata

current

CONFIDENTIAL

000060

CONFIDENTIAL

Day Eve Night \$.25 \$.16 \$.16

CONFIDENTIAL

proposed

Day

Night

Day Eve \$0.2500 \$0.1500 \$0.1500

**Annual Minutes** 

Current \$0.1926

\$0.1862

**Difference** 

**Net Revenue** 

(\$0.0064)

MCI One Savings

Interlata

current

Day Eve Night \$.25 \$.10 \$.10

proposed

\$0.2400

Rate

Eve \$0.1000 Night

\$0.1000

**Annual Minutes** 

Current

New \$0.1431

Difference

Net Revenue

\$0.1461

(\$0.0031)

T\*USA Intralata

current

Day Eve Night \$.09 \$.09 \$.09

proposed

Day Eve Night \$0.0800 \$0.0800 \$0.0800

**Annual Minutes** 

Current \$0.0900

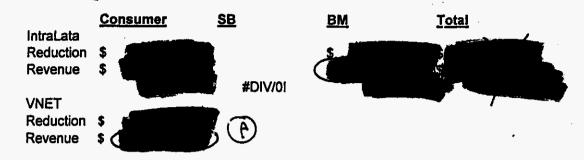
New **Difference** 

\$0.0800 (\$0.0100)

Rate Net Revenue

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Minutes VNET VISN-Out
Total Intra

SA800 VISN-Inbound VISN-Out, NM1, PR
Reduction \$ \$ \$ \$ \$
Revenue \$ \$ \$ \$



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Florida 10/98	Current Rates				
FIORIOR TOPO	Current Hates			New Rate per	
Vision - Outbound	SW Peak	Minutes*	Revenue Inipact	minute	% Change
Interlata	0.1835			0.1782	2.90%
INTRALATA	0.1421	1		0.1421	0.00%
*		1		New Rate per	
Vision - Outbound	SW Off Peak	Minutes*	Revenue Impact	minute	% Change
Interiata	0.1468			0.1425	2.90%
INTRALATA	0.1137	4		0.1137	0.00%
`				New Rate per	
Vision - Outbound	<u>DED Peak</u>	Minutes*	Revenue Imcact	minute	% Change
Interlata ====	0.1140	1		0.1107	2.90%
INTRALATA	0.1134			0.1101	2.90%
0				New Rate per	
Vision - Outbound	<b>DED Off Peak</b>	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata	0.0912	1		0.0886	2.90%
INTRALATA	0.0908	4		0.0882	2.90%
				New Rate per	
Vision - Card	<u>Rate</u>	Minutes*	Revenue Impact	<u>minute</u>	% Change
interlata	0.2132			0.2070	2.90%
INTRALATA	0.2132	1		0.2132	0.00%
	<b></b>			New Rate per	
Vision - Inbound	SW Peak	Minutes*	Revenue Impact	<u>minute</u>	% Change
interiata and intralata	0.2050			0.1989	3.00%
· · · · · · · · · · · · · · · · · · ·				New Rate per	
Vision - Inbound	SV/ Off Peak	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interiata and Intralata	0.1640			0.1591	3.00%
	DED 0 - 1			New Rate per	
Vision - Inbound	DED Peak	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata and Intralata	0.1326			0.1288	2.90%
l/ision - Inbound	DCD 0#01-	Montes	S	New-Rate per	
# ·-· · · · · · · · · · · · · · · · · ·	DED OffPeak	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interiata and Intralata	0.1061			0.1030	2.90%
				New Rate per	
NM1 (includes NM1 Card)	<u>sw</u>	Minutes*	Revenue Impact	minute	% Change
Interlata	0.1357	2		0.1340	1.25%
INTRALATA	0.1077			0.1064	1.25%
•••••	0.1011		^		1.2376
ŁIM1	DES	16:	Daniel	New Rate per	
,	DED	Minutes*	Revenue Impact	<u>minute</u>	% Change
Interlata	0.0798			0.0789	1.10%
ĮNTRALATA	0.0798	1		0.0789	1.10%
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			٠.	New Rate per			-		•
PowerRate	<u>sw</u>	Minutes*	Revenue Impact	minute	% Change				
Injeriata	0.1681	Mildida	TIO FOR THE STATE OF THE STATE	0,1632	2.90%				
INTRALATA	0.1270			0.1270	0.00%				
	0.1270	<b>T</b>		New Rate per	4,04,15				
PgwerRate	<u>ped</u>	Minutes*	Revenue Impact	minute	% Change				
Injeriata	0.1018	Militare	Tigyorido impaes	0.0988	2,90%			·	
INTRALATA	0.0980			0.0952	2.90%				
	0.0000	3		New Rate per	2.0070				
PowerRate Card	Card	Minutes*	Revenue Impact	minute	% Change				
Injeriata	0.1681	MILITAGE	Hevenue impact	0.1632	2.90%			:	
INTRALATA	0.1270	4		0.1270	0.00%				
IIA UVOVIV	0.1270			0.1270	0.00%				
VNET SW-SW (VNET Card								New Rate per	
minutes included in SW-SW)	1st 18	Addtl 6	Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	minute	% Change
Interlata	0.0646	0.0215		Milliofes	Heverine intipact	0.0626	0.0209	0.2086	3.00%
IN'IRALATA	0.0505	0.0219	0.1681			0.0020	0.0209	0.1631	3.00%
III) INCAIN	0.0505	0.0100	V. 100 i			0.0469	0.0103	New Rate per	3.00 /6
VNET SW-SW	1st 18	Addtl 6	Off Peak	Minutos	Davanus Impact	Many 4nt 10	Name Addition	minute	% Change
. 1)				Minutes*	Revenue Impact	New 1st 18	New Addtl 6		3.00%
Interiata	0.0568	0.0189	0.1891	والمراجع المراجع		0.0550	0.0183	0.1834 0.1493	3.00%
INTRALATA	0.0461	0.0154	0.1539			0.0448	0.0149	***	3.00%
VIVET OW DED	4.440		· Deale	Mandage	Davis and James at	No dat 40	Name & debt o	New Rate per	e Oberes
VNET SW-DED	1st 18	Addtl 6	Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	minute	% Change
Interlata	0.0439	0.0146	0.1461			0.0425	0.0142	0.1417	3.00%
INTRALATA	0.0444	0.0148	0.1480			0.0431	0.0144	0.1436	3.00%
VNET SW-DED Interlata INTRALATA VNET SW-DED Interlata INTRALATA								New Rate per	
VNET SW-DED	1st 18	Addtl 6	Off Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	minute	% Change
Interlata	0.0345	0.0115		4		0.0335	0.0112	0.1116	3.00%
INTRALATA	0.0349	0.0116	0.1161			0.0338	0.0113	0.1126	3.00%
				•				New Rate per	
VNET DED -DED	<u>1st 18</u>	Addtl 6	<u>Peak</u>	Minutes*	Revenue Impact	New 1st 18	New Addti 6	. <u>minute</u>	% Change
nterlata	0.0174	0,0058	0.0587			0.0174	0.0058	0.0580	0.00%
N]'RALATA	0.0174	0.0058	0.0580	i i		0.0174	0.0058	0.0580	0.00%
j:								New Rate per	
VNET DED -DED	<u>1st 18</u>	Addtl 6	Off Peak	Minutes*	Revenue Impact	New 1st 18	New Addtl 6	<u>minute</u>	% Change
Interiata	0.0123	0.0041	0.0410			0.0123	0.0041	0.0410	0.00%
NTRALATA	0.0123	0.0041	0.0410			0.0123	0.0041	0.0410	0.00%
								New Rate per	
TUBA SuperWats Plus Service 1	1st 30	Addtl 6	<u>Dav</u>	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	minute	% Change
interlata and intralata	0.0664	0.0133	0.1329			0.0645	0.0129	0.1289	3.00%
								New Rate per	
USA SuperWats Plus Service 1	1st 30	Addtl 6	<u>Evening</u>	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	minute	% Change
Interlata and Intralata	0.0607	0.0114	0.1177			0.0571	0.0114	0.1142	3.00%
₽_				-				New Rate per	
USA SuperWats Plus Service 1	1st 30	<u>Addti 8</u>	Night	Minutes*	Revenue Impact	New 1st 30	New Addtl 6	<u>minute</u>	% Change
nterlata and Intralata	0.0402	0.0080	0.0802			0.0389	0.0078	0.0778	3.00%
1'									

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			New Rate per			
	Minutes*	Revenue Impac		% Change		
			0.1288 New Rate per	3.00%	•	
,	Minutes*	Revenue impar		% Change		
	Millorea		0.1084	3.00%		•
			New Rate per	0.00%		
	Minutes*	Revenue Impac	<u>minute</u>	% Change		
			0.0789	3.00%		•
			New Rate per			
1	Minutes*	Revenue Impac	minute 0,2135	% Change 3.00%		
ŧ			New Rate per	3.00%		
	Minutes*	Revenue Impac		% Change		
İ			0.2071	3.00%		
•			New Rate per			
	Minutes*	Revenue Impac		% Change		
1			0.2071 New Rate per	3.00%		
	Minutes*	Revenue Impac		% Change		
P	AIRIOTOS	Teveriue impac	0.1896	2.05%	•	
			New Rate per	,		
A	Minutes*	Revenue Impac		% Change		:
			0.1364	2.05%		
	(limeter)	Devenue Imper	New Rate per	ev Obsess	£ (070 000 00\	
Ď	Minutes*	Revenue Impac	<u>minute</u> 0.0971	% Change 2.05%	\$ (870,336.23)	
	4		0.0371	2.00/8		
			vnet	Tall to the second second and a second	4×1(*)*	2.80%
7						
3			monthly impact	\$ 🖳		
		Calc from orig				
				<u>.</u>		
7		_				
3		₹				
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Stand Alone 800 DAL

Interlata and Intralata

Stand Alone 800 DAL

interlata and Intralata

Stand Alone 800 DAL

interlata and Intralata

Stand Alone 800 CBL interlate and intralate

Stand Alone 800 CBL Interlata and Intralata

Stand Alone 800 CBL Interlata and Intralata

Stand Alone 800 WAL

interlata and Intralata

\$tand Alone 800 WAL

Interlata and Intralata

Stand Alone 800 WAL

Interlata and Intralata

Revenue Impact calculated

·IUSA SuperWats Plus Service 1

fotal Minutes (sum of above)

ylariance

vision Minutes lower Rate Minutes VM1 Minutes VNET Minutes

3A8,00 Minutes

៊ុំptន្ | Minutes

Total MCI annual flowthrough amount amount percentage of annual FL reverue total BM annual flowthrough amount

<u>Day</u>

Evening

NightWeekend

<u>Day</u> 0.2201

Evening

☐ Night/M'eekend

**Day** 

Evening.

!light/Weekend

0.1328

0.1118

0.0813

0.2135

0.2135

0.1936

0.1393

0.0991

462

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julie I. davis

From: Sent:

Diahna Williams [Diahna.Williams@mci.com] Wednesday, November 04, 1998 5:00 PM

Julie L. Davis

J+To: Cc: Subject:

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

Florida Flow Through vs.3

importance:

High

Julie-

Here are the revised FL rates. Because of the Intralata constraints, MM has exceed the total flow through amount by mually. MM has chosen to implement this option because of various marketing/pricing strategies in the state of FL. We proposed that the used 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 FI PUC gives approval.

Thanks, Diahna

Residential

IntraLata Reduction Revenue

**Total BM** 

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Residential Dial-1: IntraLATA Section 3.02.0211

**MCI New** 

Intercity Mileage Ba

0.1000

Day

0.0700

**Night** 

0.0700

unaudite

**Annual Minutes** 

X.0872

Telco

Rate

**Net Revenue** 

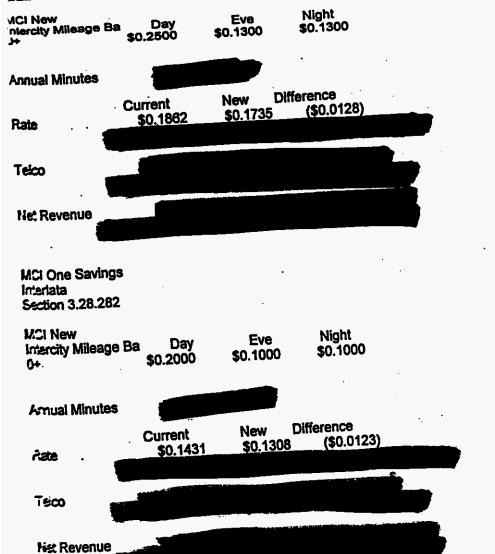
Current New Difference (\$0.0064)**80.0809** \$0.0872

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