

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Telecommunications, Inc. against Thrifty Call, Inc. regarding practices in the reporting of percent interstate usage for compensation for jurisdictional access services.

DOCKET NO. 000475-TP

DATED: FEBRUARY 7, 2008

RECEIVED-FPSC  
08 FEB -7 PM 3:06  
COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and six correct copies of COMMISSION STAFF'S TESTIMONY OF DENISE VANDIVER has been filed with Office of Commission Clerk and one copy has been furnished to the following by U. S. mail this 7th day of February, 2008:

AT&T Florida  
E. Edenfield, L. Foshee, M. Twomey, J. Tyler,  
M. Gurdian  
c/o Greg Follensbee  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1561

Messer Law Firm  
Floyd Self  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Rutledge Law Firm  
Kenneth A. Hoffman, Martin P. McDonnell  
P.O. Box 551  
Tallahassee, FL 32302

Thrifty Call, Inc.  
c/o Lovelady Management  
400 W. Hopkins, Suite 103  
San Marcos, TX 78666

CHARLENE C. POBLETE  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6199

- CMP \_\_\_\_\_
- COM 5
- CTR 1
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER DATE

00967 FEB-7 8

FPSC-COMMISSION CLERK

*DOCKET NO. 000475-TP*: Complaint by BellSouth Telecommunications, Inc. against Thrifty Call, Inc. regarding practices in the reporting of percent interstate usage for compensation for jurisdictional access services

*WITNESS*: **Direct Testimony Of Denise N. Vandiver**, Appearing On Behalf Of Staff

*DATE FILED*: February 7, 2008

DOCUMENT NUMBER-DATE

00967 FEB-7 8

FPSC-COMMISSION CLERK

DIRECT TESTIMONY OF DENISE N. VANDIVER

1  
2 Q. Please state your name and business address.

3 A. My name is Denise N. Vandiver and my business address is 2540 Shumard Oak  
4 Blvd., Tallahassee, Florida, 32399-0850.

5  
6 Q. By whom are you presently employed and in what capacity?

7 A. I am employed by the Florida Public Service Commission (FPSC or Commission)  
8 as the Bureau Chief of Auditing in the Division of Regulatory Compliance and Consumer  
9 Assistance.

10  
11 Q. How long have you been employed by the Commission?

12 A. I have been employed by the Florida Public Service Commission since March  
13 1983.

14  
15 Q. Briefly review your educational and professional background.

16 A. I have a Bachelor of Science degree with a major in accounting from Jacksonville  
17 University and a Master of Accountancy degree from the University of North Florida. I  
18 am a Certified Public Accountant licensed in the State of Florida, and I am a member of  
19 the American and Florida Institutes of Certified Public Accountants. I was hired as a  
20 Public Utilities Analyst II by the FPSC in March 1983. I worked 6-½ years in the  
21 Division of Water and Wastewater as a Regulatory Analyst performing accounting  
22 analysis of water and wastewater utilities. I then spent three years in the Economic  
23 Regulatory Standards Control Section and the Division of Research and Regulatory  
24 Review as an Economic Analyst and supervisor performing various reviews in all  
25 industries regulated by the FPSC. I was promoted to the Bureau Chief of Auditing in

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FPSC-COMMISSION CLERK

1 January, 1993 and I am responsible for managing all the financial audits performed by the  
2 Commission's three district offices. Previous to my work at the Commission I worked  
3 four years with the City of Jacksonville Beach as an Accountant and less than one year as  
4 Director of Accounting for a hospital in Savannah, Georgia.

5  
6 Q. Please describe your current responsibilities.

7 A. Currently, I am the Bureau Chief of Auditing with the responsibility to direct,  
8 control, and support the field audit staff of 20 auditors located in three cities throughout  
9 Florida. I establish and supervise compliance with operational guidelines, administrative  
10 policies and procedures for the conduct of field audits with particular attention to  
11 preserving an independent, well-trained audit staff and the completion of timely audit  
12 reports.

13  
14 Q. Have you presented testimony before this Commission or any other regulatory  
15 agency?

16 A. Yes. I have testified in two rate cases, Docket No. 830059-WS, Spring Hill  
17 Utilities, a division of Deltona Utilities, Inc., and Docket No. 840315-WS Martin Downs  
18 Utilities, Inc. I also testified before an administrative law judge at the Division of  
19 Administrative Hearings in 1998 in the case Aloha Utilities, Inc. and Florida Waterworks  
20 Association, Inc. vs. State of Florida Public Service Commission.

21

22 Q. What is the purpose of your testimony today?

23 A. The purpose of my testimony is to sponsor the staff audit report of Thrifty Call,  
24 Inc. (Thrifty or Company) which addresses the complaint by BellSouth  
25 Telecommunications, Inc. (now known as AT&T Florida) against Thrifty regarding

1 practices in the reporting of percent interstate usage (PIU) for compensation for  
2 jurisdictional access services, Audit Control Number 01-292-1-1. This audit report is  
3 filed with my testimony and is identified as Exhibit DNV-1. The audit work papers are  
4 also filed with my work papers and are identified as Exhibit DNV-2.

5

6 Q. Was the audit report prepared under your supervision, direction, and control?

7 A. Yes, I was the Bureau Chief in charge of this audit.

8

9 Q. Please describe the work you performed in this audit.

10 A. We requested Thrifty provide call detail records pertaining to BellSouth for April  
11 1999 through March 2000. We received electronic data for calls made in July through  
12 December 1999. The company stated that this was all the data that it had. We extracted  
13 from the data all calls with both originating and terminating phone numbers, as this  
14 information was the only way we could determine whether a call was interstate or  
15 intrastate. We computed the daily average record count and call duration for July through  
16 December 1999. We calculated the average minutes per call for July through December  
17 1999 and determined the PIU for each month from July through December 1999. We  
18 then totaled July through December 1999 call durations for interstate and intrastate and  
19 arrived at a grand total for PIU.

20

21 Q. Please review the audit disclosures in the audit report.

22 A. Audit Disclosure No. 1

23 Audit Disclosure No. 1 discusses the insufficient data provided. When Thrifty  
24 provided the call detail data, it claimed to have provided all the detail it possessed.  
25 However, we did not receive any data except for the period July 1999 through December

1 1999, and 37.99% of the calls on the CDs provided, did not have enough information to  
2 determine if the call should be intrastate or interstate.

3 **Audit Disclosure No. 2**

4 Audit Disclosure No. 2 discusses the PIU we calculated based on the calls with  
5 sufficient detail information. We received call detail records for July 1999 through  
6 December 1999 that included 33,250,191 calls. Only 20,617,156, or 62%, of these calls  
7 included sufficient information to determine if the call was interstate or intrastate. These  
8 calls, with sufficient detail, included 69,094,824 minutes, and 19.51% of these minutes  
9 were for interstate usage.

10

11 Q. Does that conclude your testimony?

12 A. Yes.

13

14

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25

*DOCKET NO. 000475-TP*: Complaint by BellSouth Telecommunications, Inc. against Thrifty Call, Inc. regarding practices in the reporting of percent interstate usage for compensation for jurisdictional access services

*WITNESS*: Direct Testimony Of Denise N. Vandiver, Appearing On Behalf Of Staff

*EXHIBIT DNV-1*: Audit Report



FLORIDA PUBLIC SERVICE COMMISSION

*DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE*

*BUREAU OF AUDITING*

*Tallahassee District Office*

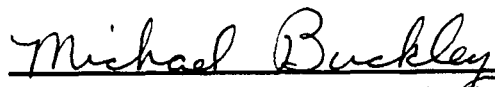
THRIFTY CALL, INC.

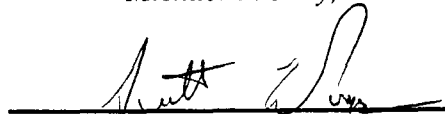
ACTUAL PERCENTAGE INTERSTATE USAGE AUDIT

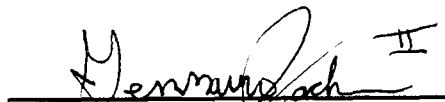
TWELVE MONTH PERIOD ENDED MARCH 31, 2000


DOCKET NO. 000475-TP

AUDIT CONTROL NO. 01-292-1-1

  
\_\_\_\_\_  
*Michael Buckley, Audit Staff*

  
\_\_\_\_\_  
*Scott Wagers, Computer Audit Analyst*

  
\_\_\_\_\_  
*Gennarro Jackson II, Audit Staff*

  
\_\_\_\_\_  
*Lynn M. Deamer, Audit Supervisor*

DOCUMENT NUMBER-DATE

00967 FEB-7 8

FPSC-COMMISSION CLERK



## TABLE OF CONTENTS

<b>I.</b>	<b>AUDITOR'S REPORT</b>	<b>PAGE</b>
	PURPOSE .....	1
	DISCLAIM PUBLIC USE.....	1
	SUMMARY OF SIGNIFICANT PROCEDURES.....	2
<b>II.</b>	<b>DISCLOSURES</b>	
	1. INSUFFICIENT DATA .....	3
	2. PERCENTAGE INTERSTATE USAGE.....	4
<b>III.</b>	<b>EXHIBIT</b>	
	1. PERCENTAGE INTERSTATE USAGE.....	5

**DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE  
AUDITOR'S REPORT**

**June 24, 2004**

**TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES**

We have applied the procedures described later in this report to audit the percentage interstate usage, (PIU), for the 12-month period ending March 31, 2000. The schedule for "Percent of Grand Total for July through December 1999" has been included as an exhibit in this report. There is confidential information associated with this audit.

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.

## 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.

**Verify** - The item was tested for accuracy, and substantiating documentation was examined.

---

Read prior filed complaints that involved the companies included in this docket.

Obtained case background information from the Commission online file system.

Scanned Company provided documents and related Commission orders.

Obtained CD-ROMs containing all call detail records pertaining to BellSouth for April 1999 through March 2000.

Separated the record counts into a group that had enough information to identify Interstate and Intrastate calls.

Computed daily average of record count and call duration for July through December 1999.

Calculated average minutes per call for July through December 1999.

Determined Percentage Interstate Usage for each month from July through December 1999.

Totaled July through December 1999 call durations for Interstate and Intrastate and arrived at a grand total for Percentage Interstate Usage.

## II. Disclosures

### Disclosure No. 1

**Subject:** Insufficient Data

**Statement of Fact:** Thrifty Call claims to have provided all the detail they possess on 2 CD-ROMs that it sent to the Florida Public Service Commission on February 12, 2002. However, for the period July 1999 through December 1999, 37.99% of the calls on these CDs, did not have enough information to determine if the call should be Intrastate or Interstate.

**Disclosure No. 2**

**Subject: Percentage Interstate Usage**

**Statement of Fact:** For the period July 1999 through December 1999, 20,617,156 of 33,250,191 calls had enough information to determine if the calls should be classified Interstate or Intrastate. There were 69,094,823.739 total minutes in the readable records. Interstate minutes were 13,482,400.687 and Intrastate minutes were 55,612,423.032. This results in a Grand Total Percentage Interstate Usage (PIU) of 19.51%. See Exhibit for calculations.

**III. EXHIBIT**

**Thrifty Call, Inc.**  
**Docket: 000475-TP**  
**ACN: 01-292-1-1**  
**Determination of actual PIU**  
**Percent of Grand Total for July through December 1999**

	July to December <u>Total</u>	Percent to Total <u>July to December</u>
<b>Number of Calls with Insufficient Data to Determine Usage</b>	12,633,035	37.99%
<b>Number of Calls with Sufficient Data to Determine Usage</b>	20,617,156	62.01%
<b>Total</b>	<u>33,250,191</u>	<u>100.00%</u>
<b>Interstate Calls</b>	3,103,110	15.05%
<b>Intrastate Calls</b>	17,514,046	84.95%
<b>Total</b>	<u>20,617,156</u>	<u>100.00%</u>
<b>Interstate Call Duration</b>	13,482,400.687	19.51%
<b>Intrastate Call Duration</b>	55,612,423.032	80.49%
<b>Total</b>	<u>69,094,823.739</u>	<u>100.00%</u>

*DOCKET NO. 000475-TP*: Complaint by BellSouth Telecommunications, Inc. against Thrifty Call, Inc. regarding practices in the reporting of percent interstate usage for compensation for jurisdictional access services

*WITNESS*: Direct Testimony Of Denise N. Vandiver, Appearing On Behalf Of Staff

*EXHIBIT DNV-2*: Staff Audit Work Papers

DOCUMENT NUMBER-DATE

00967 FEB-7 8

FCC COMMUNICATIONS DIV



FLORIDA PUBLIC SERVICE COMMISSION

*DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE*

*BUREAU OF AUDITING*

*Tallahassee District Office*


THRIFTY CALL, INC.

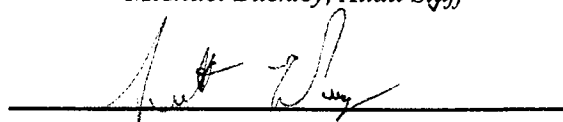
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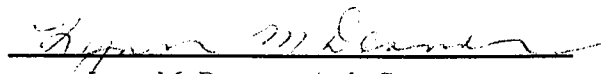
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00967 FEB-7 8

FPSC-COMMISSION CLERK



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**DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE  
AUDITOR'S REPORT**

**June 24, 2004**

**TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES**

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### Disclosure No. 1

**Subject:** Insufficient Data

*10-2.1 to 11-2.1*  
**Statement of Fact:** Thrifty Call claims to have provided all the detail they possess on 2 CD-ROMs that it sent to the Florida Public Service Commission on February 12, 2002. However, for the period July 1999 through December 1999, 37.99% of the calls on these CDs, did not have enough information to determine if the call should be Intrastate or Interstate. *44-3*

113  
6-23-99

**Disclosure No. 2**

**Subject: Percentage Interstate Usage**

**Statement of Fact:** For the period July 1999 through December 1999, 20,617,156 of 33,250,191 44-3 calls had enough information to determine if the calls should be classified Interstate or Intrastate. There were 69,094,823.739 total minutes in the readable records. Interstate minutes were 44-3 13,482,400.687 and Intrastate minutes were 55,612,423.032. This results in a Grand Total Percentage Interstate Usage (PIU) of 19.51%. See Exhibit for calculations.

1-15  
 6/20/00

**III. EXHIBIT**

Thrifty Call, Inc.  
 Docket: 000475-TP  
 ACN: 01-292-1-1  
 Determination of actual PIU  
 Percent of Grand Total for July through December 1999

	July to December <u>Total</u>	Percent to Total <u>July to December</u>
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<b>Interstate Call Duration</b>	13,482,400.687	19.51%
<b>Intrastate Call Duration</b>	55,612,423.032	80.49%
<b>Total</b>	<u>69,094,823.739</u>	<u>100.00%</u>

State of Florida



Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: ACR

## Public Service Commission

### -M-E-M-O-R-A-N-D-U-M-

---

**DATE:** October 22, 2001  
**TO:** District Regulatory Analyst Supervisor, Tallahassee (Deamer)  
**FROM:** Division of Regulatory Oversight (Vandiver)  
**RE:** Docket No. 000475-TP; Thrifty Call, Inc.; Audit Purpose: Audit call data and supporting documentation to determine actual PIU for year ended March 31, 2000; Audit Control No. 01-292-1-1

---

Attached is a new audit service request. The analyst's requested due date is January 15, 2002. In order to meet the due date, the audit work papers should be delivered to my office two days before the stated due date.

DNV/JCP

Attachments

cc: Office of Public Counsel

65  
3/02

# AUDIT SERVICE REQUEST

October 18, 2001  
Date of Request

\_\_\_\_\_  
RGO control #

TO : DIVISION OF REGULATORY OVERSIGHT

FROM: Division of Competitive Services Sally Simmons 413-6605  
Division Name Phone Number

RE : REQUEST FOR AUDIT OF: Thrifty Call, Inc.

DOCKET NO.: 000475-TP 01-292-1-1

AUDIT PURPOSE: Audit call data and supporting documentation to determine actual PIU (percentage interstate usage) for year ended March 31, 2000.

LIST AUDIT OBJECTIVES & OTHER INFORMATION ON BACK.

ADMINISTRATIVE DETAILS:

COMPANY CONTACT: \_\_\_\_\_  
Name Title Phone Number

MAIL ADDRESS: \_\_\_\_\_  
Street Address

\_\_\_\_\_  
City State Zip Code

LOCATION OF RECORDS: \_\_\_\_\_  
City State

AUDIT DUE DATE: 1/15/02

COORDINATING DETAILS: Wayne Knight is the assigned attorney (413-6232)  
(Name and Phone Number of other Division staff and any other administrative instructions)

REFERENCES: \_\_\_\_\_  
(Attach copies of FPSC ORDERS and other documents as appropriate)

BACKGROUND INFORMATION: \_\_\_\_\_



GJ  
3/03

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-202-1-1  
Description: ASR - Audit Objective

**AUDIT OBJECTIVE OR QUESTION**  
(Add supplemental background for auditor)

ITEM #

In Docket No. 991751-TP, Sprint-Florida, Incorporated filed a complaint against Thrifty Call, Inc regarding the reported PIU. This case was settled and an audit was not completed. However, the Miami district office prepared for the audit and has some background information. In Docket No. 000690-TP, BellSouth Telecommunications filed a similar complaint against Intermedia Telecommunications, Inc. This docket also was recently settled without an audit being completed. Attached to this ASR is the complaint filed initiating this docket. Supplemental background information will be provided separately.

PIU calculation w/ p 44

STATE OF FLORIDA

Commissioners:  
E. LEON JACOBS, JR., CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
BRAULIO L. BAEZ  
MICHAEL A. PALECKI



DIVISION OF REGULATORY OVERSIGHT  
DANIEL M. HOPPE, DIRECTOR  
(850) 413-6480

## Public Service Commission

October 22, 2001

**Thrifty Call, Inc**  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description:

Harold L. Lovelady  
Thrifty Call, Inc.  
125 Moore Street, Suite 101  
San Marcos, TX 78666-4478

**Re: Docket No. 000475-TP; Thrifty Call, Inc.;**  
**Audit Request: Audit Call Data and Supporting documentation to determine actual PIU for year ended March 31, 2000; Audit Control No. 01-292-1-1**

Dear Mr. Lovelady:

The Florida Public Service Commission will audit call data and supporting documentation to determine actual percentage interstate usage (PIU) for year ended March 31, 2000, in accordance with Commission audit procedures. Access will be requested to documents and records of the utility and, if necessary, supporting records for affiliate company transactions that affect regulated operations. Staff auditors may also request to review the utility's external audit working papers for the most recent independent audit. Lynn Deamer, the district office supervisor, will coordinate this audit. Questions regarding the audit or audit staff should be directed to the district supervisor or myself. My phone number is (850) 413-6487 and Ms. Deamer can be reached at (850) 413-6416.

The Audit Access to Records rule for each industry states:


In those instances where the utility disagrees with the auditor's assessment of a reasonable response time to the audit request, the utility shall first attempt to discuss the disagreement with the auditor and reach an acceptable revised date. If agreement cannot be reached, the utility shall discuss the issue with successive levels of supervisors at the Commission until an agreement is reached.

Harold L. Lovelady  
Page 2  
October 22, 2001

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *Employee - Letter*

A formal report is expected to be issued for internal Commission use on January 15, 2002. A copy of the final report will be mailed to the company liaison listed in the Commission Mailing Directory.

Sincerely,



Denise N. Vandiver  
Bureau Chief of Auditing Services

cc: Division of Regulatory Oversight (Tallahassee District Office Supervisor, File Folder)  
Division of the Commission Clerk and Administrative Services  
Division of Legal Services  
Office of the Public Counsel

BellSouth Telecommunications, Inc.  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Floyd Self, Esq.  
Messer Law Firm  
P. O. Box 1876  
Tallahassee, FL 32302-1876

Danny Adams, Esq.  
Kelley Law Firm  
1200 19<sup>th</sup> Street, NW#500  
Washington, D.C. 20036

4-3.1

JJ  
8/03

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

### -M-E-M-O-R-A-N-D-U-M-

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *POCKET NO 000475 - Filed Complaint*  
DATE: JULY 20, 2000

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF LEGAL SERVICES (VACCARO)  
DIVISION OF REGULATORY OVERSIGHT (VANDIVER)  
DIVISION OF COMPETITIVE SERVICES (SIMMONS)

RE: DOCKET NO. 000475-TP - COMPLAINT BY BELLSOUTH  
TELECOMMUNICATIONS, INC. AGAINST THRIFTY CALL, INC.  
REGARDING PRACTICES IN THE REPORTING OF PERCENT INTERSTATE  
USAGE FOR COMPENSATION FOR JURISDICTIONAL ACCESS SERVICES.

AGENDA: AUGUST 1, 2000 - REGULAR AGENDA - MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL AUTHORITY AND MOTION TO DISMISS OR, IN THE  
ALTERNATIVE, STAY - PARTIES MAY PARTICIPATE.

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\LEG\WP\000475.RCM

#### CASE BACKGROUND

On April 21, 2000, BellSouth Telecommunications, Inc. (BellSouth) filed a complaint against Thrifty Call, Inc. (Thrifty Call). BellSouth alleges that Thrifty Call is intentionally and unlawfully reporting erroneous Percent Interstate Usage (PIU) factors to BellSouth in violation of BellSouth's Intrastate Access Tariff and the rules and regulations established by the Commission. BellSouth alleges that erroneous PIUs have resulted in the under reporting of intrastate access terminating minutes to BellSouth, causing BellSouth financial harm. BellSouth has requested that the Commission take all action appropriate to protect the company from further financial harm.

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No. 01-292-1-1  
Description: Docket No. 000475-TP

On May 16, 2000, Thrifty Call timely filed a Motion to Dismiss or, in the Alternative, to Stay BellSouth's complaint. On May 30, 2000, BellSouth timely filed a Response and Opposition to Thrifty Call's Motion to Dismiss or Stay.

On June 26, 2000, BellSouth filed a Motion for Leave to File Supplemental Authority in support of its opposition to Thrifty Call's motion to dismiss or stay. On July 10, 2000, Thrifty Call filed its Response and Opposition to BellSouth's Motion for Leave to File Supplemental Authority. This recommendation addresses each party's motion.

#### DISCUSSION OF ISSUES

**ISSUE 1:** Should the Commission grant BellSouth Telecommunications, Inc.'s Motion for Leave to File Supplemental Authority?

**RECOMMENDATION:** No. The Commission should deny BellSouth Telecommunications, Inc.'s Motion for Leave to File Supplemental Authority. (VACCARO)

**STAFF ANALYSIS:** On June 26, 2000, BellSouth filed a Motion for Leave to File Supplemental Authority in support of its opposition to Thrifty Call's motion to dismiss or stay. BellSouth seeks to submit an order of the North Carolina Utilities Commission (NCUC) which denied Thrifty Call's motion to dismiss a BellSouth complaint for misreported PIU in North Carolina.

On July 10, 2000, Thrifty Call filed its Response and Opposition to BellSouth's Motion for Leave to File Supplemental Authority. Thrifty Call asserts the following in support of its opposition to BellSouth's motion:

1. The Commission has no rules or procedures for the filing of supplemental authorities. See Order No. PSC-99-1463-FOF-SU (July 27, 1999); Order No. PSC-97-0283-FOF-WS (March 12, 1997); Order No. PSC-96-1527-FOF-WS (December 16, 1996). The Commission has noted, however, that, in accord with Rule 9.225, Florida Rules of

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
FIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: 1-27-00 0492

Appellate Procedure, it has the authority to consider supplemental authority. Id.;

2. The Commission has stated that "a notice of supplemental authority drawing our attention to authority newly discovered and devoid of argument would be properly received." Order No. PSC-97-0283-FOF-WS (citing In Re: Petition for Limited Proceeding to Implement Conservation Plan in Seminole County by Sanlando Utilities Corporation Order No. PSC-94-0987-FOF-WS (August 15, 1994)). Similarly, in Order No. PSC-96-1527-FOF-WS (December 16, 1996), the Commission noted that it may be proper to consider supplemental authority if a party alleges that some point of law has been overlooked during the course of the proceedings. BellSouth has submitted the NCUC order purely for the sake of argument and, therefore, the order does not meet the Commission's test for receiving supplemental authority;

3. Inherent in the notion of supplemental authority is the idea that the referenced document contains a statement of governing law. An NCUC order interpreting North Carolina laws or tariffs is not dispositive, let alone relevant, to the Commission's investigation of Florida Law and BellSouth's Florida tariff.

### Analysis

Rule 9.225, Florida Rules of Appellate Procedure states:

Notices of supplemental authority may be filed with the court before a decision has been rendered to call attention to decisions, rules, statutes, or other authorities that are significant to the issues raised and that have been discovered after the last brief served in the cause. The notice may identify briefly the points argued on appeal to which the supplemental authorities are pertinent, but shall not contain argument. (Emphasis added.)

As indicated by Thrifty Call, the Commission has noted that, in accord with this rule, it has the authority to consider supplemental authority. BellSouth states in its motion that Thrifty Call's motion to dismiss in North Carolina is identical to

62  
7/13

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description:

the motion to dismiss filed in Florida, and that the NCUC denied the motion to dismiss and set BellSouth's complaint for hearing. Obviously, BellSouth has filed its motion for leave to file supplemental authority with the intention that the Commission follow suit with the NCUC. Therefore, it is apparent that BellSouth has filed its motion for the sake of argument.

In Docket No. 930256-WS, In Re: Petition for Limited Proceeding to Implement Conservation Plan in Seminole County by Sanlando Utilities Corporation, the utility called to the Commission's attention in a notice of supplemental authority, newly-enacted Section 367.0817, Florida Statutes. Sanlando argued that because the statute addressed the objections raised to the Commission's order approving the utility's conservation plan, they should be dismissed. By Order No. PSC-94-0897-FOF-WS, the Commission rejected the notice as argumentative.

In Docket No. 950758-WS, In Re: Petition for Approval of Transfer of Facilities of Harbor Utilities Company, Inc. to Bonita Springs Utilities and Cancellation of Certificates Nos. 272-W and 215-S in Lee County, Bonita Springs Utilities (BSU) sought consideration of an opinion of the Second Court of Appeal in State of Florida Department of Environmental Protection v. Harbor Utilities Co., Inc., 21 Fla.L.Weekly D2664. By that order, the Second DCA reversed the trial court's order dismissing Harbor Utilities Company, Inc.'s president as an individual in a DEP administrative enforcement action taken against Harbor and its president individually. BSU argued that the court opinion was additional support for its contention that the transfer of Harbor to BSU was in the public interest and that the objecting Harbor customers' recourse was not against BSU, but against Harbor and its president. By Order No. PSC-97-0283-FOF-WS, issued March 12, 1997, the Commission denied consideration of the court opinion stating at page 5 that BSU had submitted the court opinion for the purpose of argument.

Accordingly, consistent with Rule 9.225, Florida Rules of Appellate Procedure, and the Commission orders cited by Thrifty Call, BellSouth's motion should be denied, because it appears that BellSouth has filed its motion for the purpose of argument.

Further, Staff agrees with Thrifty Call that the NCUC order is not dispositive or relevant to the current proceeding. Based on the foregoing, staff recommends that the Commission deny BellSouth

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

**Thrifty Call, Inc**  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: (000475-TP)

Telecommunications, Inc.'s Motion for Leave to File Supplemental Authority.



DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *...*

**ISSUE 2:** Should the Commission grant Thrifty Call, Inc.'s Motion to Dismiss or, in the Alternative, to Stay?

**RECOMMENDATION:** No. The Commission should deny Thrifty Call, Inc.'s Motion to Dismiss or, in the Alternative, to Stay. (VACCARO, SIMMONS)

**STAFF ANALYSIS:** On May 16, 2000, Thrifty Call timely filed a Motion to Dismiss or, in the Alternative, to Stay BellSouth's complaint. On May 30, 2000, BellSouth timely filed a Response and Opposition to Thrifty Call's Motion to Dismiss or Stay.

Motion to Dismiss

Thrifty Call asserts the following in support of its motion to dismiss:

1. BellSouth is required by law to comply with the terms of its own tariff and should be required to demonstrate such compliance before filing any action against Thrifty Call. See Pan American World Airways, Inc. v. Florida Public Service Commission, 427 So. 2d 716 (Fla. 1983); Louisville & Nashville Railroad v. Speed-Parker, Inc., 137 So. 724 (Fla. 1931);
2. BellSouth has failed to comply with its own intrastate tariff. Section E2.3.14(B) of BellSouth's Access Tariff specifically provides for audits to be conducted in disputes such as this, and specifies the procedures to be followed in such cases. Thrifty Call has never disputed BellSouth's right to conduct an audit, has expressed willingness to agree to an audit, and had recommended a proposed auditor. In response, BellSouth refused to approve an auditor, demanded payment from Thrifty Call and filed this complaint;
3. Without an audit, there is no basis for BellSouth to make the outrageous demands and false assertions contained in its complaint. Until such time, it is unknown if there is a controversy to be resolved by way of a complaint;
4. BellSouth's complaint is misleading and misstates the facts. For example, BellSouth asserts that it has

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description:

been harmed and will continue to be harmed unless the Commission acts. Thrifty Call has sent no traffic to BellSouth since January 2000. Thrifty Call disconnected its feature group facilities with BellSouth by April 7, 2000. Therefore, there is no continuing or growing harm to BellSouth.

Response

BellSouth asserts the following in support of its opposition to Thrifty Call's motion to dismiss:

1. Section E2.3.14 (B) (1) of BellSouth's tariff provides in relevant part as follows:

When an IC or End User provides a projected interstate usage set forth in A. preceding, or when a billing dispute arises or a regulatory commission questions the projected interstate percentage for *BellSouth SWA*, the Company may, by written request, require the IC or End User to provide the data the IC or End User used to determine the projected interstate percentage. This written request will be considered the initiation of the audit. (Emphasis added by BellSouth)

The language of the tariff is clear that the audit is discretionary on the part of BellSouth. The audit is not mandatory, nor is it exclusive of other rights and remedies of BellSouth, including Commission action;

2. BellSouth conducted test calls. The test call data is as good as, if not better than, an audit. Further, Thrifty Call's so called "acquiescence" to the audit was unacceptable, because Thrifty Call wanted to limit it to adjusting PIU on an ongoing basis, which would provide no relief to BellSouth for Thrifty Call's past tariff violations;

3. The fact that Thrifty Call may disagree with the factual assertions contained in BellSouth's complaint, i.e., "BellSouth's outrageous demands and false

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit - Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: (BellSouth vs. Thrifty Call)

assertions," is not grounds for dismissal of the complaint;

4. In regard to Thrifty Call's assertion that there is no ongoing harm to BellSouth, the fact that Thrifty Call is not currently passing traffic does not mean that it cannot start passing traffic again in the future, and misrepresenting the PIU on the traffic.

### Analysis

A motion to dismiss raises as a question of law the sufficiency of the facts alleged in a petition to state a cause of action. Varnes v. Dawkins, 624 So.2d 349, 350 (Fla. 1st DCA 1993). The standard to be applied in disposing of a motion to dismiss is whether, with all allegations in the petition assumed to be true, the petition states a cause of action upon which relief may be granted. Id. When making this determination, only the petition can be reviewed, and all reasonable inferences drawn from the petition must be made in favor of the petitioner. Id.

Thrifty Call argues that BellSouth has failed to comply with its own intrastate tariff by refusing to agree to an audit of Thrifty Call's PIU. The crux of Thrifty Call's motion to dismiss is that absent an audit there is no basis for BellSouth's allegations; therefore, it cannot be determined if a controversy exists. Nevertheless, under Varnes, BellSouth's allegations must be assumed to be true for the purpose of making a determination on Thrifty Call's motion to dismiss. BellSouth has alleged that Thrifty Call has overstated its terminating PIU, thereby causing BellSouth financial injury. Under Varnes, BellSouth is only required to state a cause of action for which relief can be granted; it is not required to prove the ultimate issues of fact. Thrifty Call's motion to dismiss goes beyond BellSouth's complaint to the ultimate issues of fact. Therefore, staff believes that Thrifty Call's motion to dismiss should be denied on this ground.

Thrifty Call also argues that there is no continuing or growing harm to BellSouth. Again, Thrifty Call's assertion goes beyond BellSouth's complaint to the ultimate issues of fact. Based on Varnes, staff believes that Thrifty Call's motion to dismiss should also be denied on this ground.

673  
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DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Docket No. 000475

Motion to Stay

In the event that the Commission denies Thrifty Call's motion to dismiss, it alternatively requests that the complaint be stayed until such time as an audit pursuant to BellSouth's Florida Intrastate Tariff has been conducted. BellSouth opposes Thrifty Call's motion to stay based on the grounds set forth in its opposition to Thrifty Call's motion to dismiss.

BellSouth contacted Thrifty Call by letter on January 18, 2000, requesting the data used by Thrifty Call to determine PIU. BellSouth indicated that the data request would be considered the initiation of an audit pursuant to its tariff. BellSouth also requested payment by Thrifty Call for the misreported traffic. BellSouth also mailed letters to Thrifty Call on January 31, 2000 and February 1, 2000. Thrifty Call responded by letter on February 10, 2000, indicating that it was willing to participate with an audit; however, it stated that it was unwilling to make any payments at the present. On March 22, 2000, Thrifty Call mailed another letter to BellSouth indicating that it was still willing to proceed with an audit. Apparently, there was concern of a potential conflict of interest, because the auditor had performed prior work for BellSouth. Thrifty Call also expressed concern that BellSouth was considering a complaint before the Commission. BellSouth filed its complaint with the Commission on April 21, 2000, alleging that Thrifty Call had purported to agree to an audit, but under unreasonable terms.

Staff has reviewed the pertinent provisions of BellSouth's Intrastate Tariff. Under Section E2.3.14(B)(1) of BellSouth's tariff, Thrifty Call was required to supply the data used to determine the PIU to an independent auditor within 30 days of BellSouth's request. In addition, this section of the tariff provides the following:

Where attempts to obtain the appropriate data from the IC or End User beyond the 30 day time limit have failed, the Company may provide such documentation to the Commission as an indication of the IC or End User being in violation of this Tariff.

To the best of staff's knowledge, Thrifty Call did not provide any of the required data, due apparently to the parties' disagreement

DOCKET NO. 000475-TP  
DATE: JULY 20, 2000

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Docket No. 000475-TP

over the auditor/terms of the audit. This disagreement, however, cannot be used as justification for failing to provide the required data. In particular, Section E2.3.14(B) (4) provides the following:

Where an independent auditor cannot be agreed upon within 30 days the IC or End User shall supply the data to the Joint LEC Audit Committee's auditor. If the IC or End User does not comply with the 30 day time frame, the FPSC shall be notified and provided with all documentation substantiating requests made by the Company.

Staff believes that BellSouth has acted in accordance with its tariff by filing this complaint. Therefore, staff believes that it is appropriate for the Commission to proceed with this docket. If necessary, an audit can be undertaken by staff within this proceeding.

Based on the foregoing, staff recommends that Thrifty Call, Inc.'s Motion to Dismiss or, in the Alternative, to Stay should be denied.

**ISSUE 3:** Should this docket be closed?

**RECOMMENDATION:** No. If the Commission approves staff's recommendation in Issue 2, this docket should remain open pending resolution of BellSouth's complaint. (VACCARO)

**STAFF ANALYSIS:** If the Commission approves staff's recommendation in Issue 2, this docket should remain open pending resolution of BellSouth's complaint.

PERCENTAGE INTERSTATE USAGE AUDIT  
 AUDIT PROGRAM

Company: Thrifty Call, Inc. Audit Manager: Denise Vandiver  
 Docket: 000475 Date: July 2003  
 Control #: 01-292-1-1 Approved by: LMD

PROGRAM STEPS	EST HRS	Actual Hours	Completed BY	W/P REF
OBJECTIVE: To prepare the audit staff with the background information necessary to plan the audit assigned, to familiarize the staff with the industry and principle parties involved and to establish the nature and timing of field work.				
I. PRE-FIELD WORK				
A. Read and review as required:				
1. Permanent files	40	28	MB GDT	N/A
2. Prior audit work papers				
3. Prior audit report				
4. Prior Orders				
5. Commission Rules and Regulations		✓	↓	↓
B. Discuss matters that may affect the audit with other Commission Staff members responsible as necessary.				
1. Analyst: Sally Simmons				
2. Date of Contact:				
C. Prepare the audit program. Include consideration of the audit services requested in the audit program.				
	8		GDT	6
D. Establish the timing of audit work.				
	2		GDT	
1. Begin field work: 7/03				
2. End field work:				
3. Supervisor's final review:				
E. Discuss the type, scope, and timing of the examination with management of the company coordinate the assistance of company personnel in data preparation. Arrange with the company for adequate working space for auditor and access to records.				
Company Contact: Floyd Self Phone: (850) 222-0720				
F. Determine if EDP support will be needed.				
1. Prepare EDP requests and show supervisor.			LV	10-1.5

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000475 Audit Control No. 01-292-1-1  
 Description: audit program (PIU)

SWJ  
 8/10/03

PERCENTAGE INTERSTATE USAGE AUDIT  
 AUDIT PROGRAM

Company: Thrifty Call, Inc. Audit Manager: Denise Vandiver  
 Docket: 000475 Date: July 2003  
 Control #: 01-292-1-1 Approved by: LMD

PROGRAM STEPS	EST HRS	Actual Hours	Completed BY	W/P REF
OBJECTIVE: To determine if the company's books and records are in compliance with the Uniform system of Accounts and Commission Rules in the recording of fuel revenues expenses, true-up, and over/under recovery accounts.				
II. General Field Work				
A. Gather an understanding of the company's methodologies and procedures used to determine the PIU (percentage interstate usage).			SWJ	-5
1. Audit call data and source documentation to determine actual percentage interstate usage (PIU) for year ended March 31, 2000.		121	MB	44 series
2. Request documents and records of the utility and its affiliate company transactions regarding this docket.			SWJ	11/2/03
III. Post Field Work				
A. Assemble and compile audit work papers.		25	SWJ	N/A
B. Write Audit Report				
1. For any exceptions, recalculate and report corrected values.		4hrs	SWJ	1
C. Review work papers and make proper revisions.		28	MB	
D. Prepare evaluation on EDP services.		4	MB	
E. Supervisor Review Workpapers				
Total Hours:				

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000475 Audit Control No. 01-292-1-1  
 Description: Audit Program (PIU)





65  
2/03

COMMISSIONERS:  
E. LEON JACOBS, JR., CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
BRAULIO L. BAEZ  
MICHAEL A. PALECKI

STATE OF FLORIDA



DIVISION OF REGULATORY OVERSIGHT  
DANIEL M. HÖPPE, DIRECTOR  
(850) 413-6480

Public Service Commission

October 23, 2001

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *Letter of Request*

Mr. Floyd Self  
Messer Law Firm  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Dear Mr. Self:

Docket No. 000475-TP; Investigation of Thrifty Call Percentage Interstate Usage

Enclosed with this letter are the first six audit requests for the current audit of Thrifty Call. The first request has a due date of November 2, 2001 and the remaining requests are due on November 13, 2001. Currently, I am the audit manager in charge of the audit as our audit workload is very heavy. If you should have any questions concerning these requests, please call me at (850) 413-6487. I will be out of the office October 23 through October 25 but will return on Friday, October 26, 2001.

I also would like to discuss with you how you would like to set up the audit arrangements: 1) should all requests should go through you or someone else, 2) will everything be sent here to the Commission for audit purposes or would you like us to visit your offices or the utility offices. I plan to discuss these arrangements the week before the last five requests are due.

Sincerely,

A handwritten signature in cursive script that reads "Denise N. Vandiver".

Denise N. Vandiver  
Chief of Auditing Services

Enclosures

10-1

315  
8/03

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

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 1 DATE OF REQUEST: October 24, 2001

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: November 2, 2001

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

**ITEM DESCRIPTION:**

Provide a notarized statement giving authorization to BellSouth to provide all billing records, contracts, audits, test calls, etc. to Commission audit staff.

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\_\_\_\_\_

TO: AUDIT MANAGER Denise Vandiver 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 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)

10-1.1

1/03

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

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 2 DATE OF REQUEST: October 24, 2001

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: November 13, 2001

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. Provide copies of all PIU reports for 1999 and 2000.
2. Provide all supporting documentation used to generate the reports for April 1999 through March 2000.
3. Provide all audits performed on the PIU factors (internal and external) during 1999 and 2000.
4. Provide a list of all internal audits performed in 1999 and 2000 (internal, external, and those provided to legal staff).
5. Provide all test calls performed for April 1999 through March 2000.
6. Provide copies of contracts or agreements with BellSouth.

TO: AUDIT MANAGER Denise Vandiver 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 INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MUST, 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL 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)

10-1.2

375  
8/03

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

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 3 DATE OF REQUEST: October 24, 2001

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: November 13, 2001

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. Provide the names of the carriers (interexchange or otherwise) for which Thrifty Call is terminating traffic to BellSouth.
2. Provide the volume of traffic for each carrier terminated to BellSouth for each month of 1999 and 2000.
3. Provide copies of any communications and agreements that Thrifty Call has with carriers that involve traffic terminating to BellSouth.
4. Provide copies of any operational documents that describe the terms and conditions of terminating traffic from any other carrier to BellSouth.
5. Provide Traffic Dispersion Reports for 1999 and 2000.
6. Provide copies of written internal controls for the Traffic Dispersion Report and for the traffic call processing system.

TO: AUDIT MANAGER Denise Vandiver 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 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)

10-1.3

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9/13

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

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 4 DATE OF REQUEST: October 24, 2001

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: November 13, 2001

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. Provide system documentation depicting the flow of records from the time a record is handed off to Thrifty Call from a carrier until it reaches the Traffic Dispersion Report and from the time that a call is handed off to Thrifty Call until it reaches BellSouth.
2. Provide the source of all call detail records for the Traffic Dispersion Reports.
3. Provide a list of all modifications to the Report.
4. Provide a list of major changes in the network or major traffic fluctuations.
5. Provide a printout and file layout of the January 2000 CDAR tapes.
6. Provide information about where BellSouth calls are switched and the type of switch(es).
7. Have available all billing records from April 1999 through March 2000.

TO: AUDIT MANAGER Denise Vandiver 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 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)

10-1.4

FLOYD A PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

Docket No. 000475-TP  
Exhibit DNV-2 (Page 31 of 67)  
Staff Audit Work Papers

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 5 DATE OF REQUEST: October 24, 2001

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: November 13, 2001

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

Provide all CDAR records from April 1999 through March 2000. Please see attachments A and B of this request for the required format desired for company response.

All questions should be addressed to:

B. J. Halbert  
Division of Regulatory Oversight  
2450 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6414

TO: AUDIT MANAGER Denise Vandiver DATE: 2/7/2002

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY - 2 test CDROMs
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY: \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEM(S) above 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)

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No. 01-292-1-1  
Description: Audit Request 5

[Signature]  
(SIGNATURE AND TITLE OF RESPONDENT)

Counsel for Thrifty Call

45  
8/02

ATTACHMENT A

FLORIDA PUBLIC SERVICE COMMISSION

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Audit Report on MIA

Company: \_\_\_\_\_

Docket No. \_\_\_\_\_

1. Computerized records of following per specifications in Attachment B.
  1. Call Detail Record Tapes for months April 1999 through March 2000.
  2. Each month should be contained in a separate file and physically on a separate tape.
  3. If confidentiality per note below is a consideration, submit confidential and non-confidential on separate tape cartridges.

**NOTE:** If confidential treatment is desired by the company per F.A.C. 25-22.006, a notice of intent to request such treatment must be filed with the PSC Division of Commission Clerk and Administrative Services and a copy appended to the submission of the above data. A formal request for confidentiality must be filed within 21 days after the staff receives the data unless the data is obtained during the course of an audit, in which case no later than 21 days after the field audit exit conference.

2. In addition to files identified in item 1 above for tape media, provide the following in printed form (hardcopy):
  1. Printouts:
    1. Record layout
    2. Field Descriptions
    3. Record Dump (first 50 records of each file type)
    4. Listing of record lengths (LRECL) and record counts for each file
3. Name, position, and telephone number of a knowledgeable data processing contact person at the Utility with whom any EDP related questions/problems can be discussed.

ATTACHMENT B  
FLORIDA PUBLIC SERVICE COMMISSION  
COMPUTER MEDIA SPECIFICATIONS

403

1. Electronic Data requested should be furnished in one of the following 3 methods:

1. Specifications for Data Transferred Electronically  
FTP - ASCII format, fixed record length (no variable). IP address, Logon ID, password and data set names will be provided by PSC.
2. Specifications for External Data (DAT 1, 2, or 3)  
Four MM DAT. Cartridges - sequential (flat file) formats of DDS3, DDS2, and DDS1 are acceptable.
3. Specifications for External Data (IBM)  
Cartridge/Tape - **3480 or 3490 cartridge (IBM format)** Round tape reels are NOT acceptable. Data stored on round tapes will need to be copied to cartridges before sending to the Commission. Data is ASCII format, signed decimal or non-labeled, may be acceptable under certain conditions. (ie: Must be sequential, fixed record length.) Please contact B J Halbert to verify that ASCII will be acceptable.

Density - 38,800 bpi. If data is to be copied from 9 track reel 6250/1600/800 may be acceptable.

Standard Label - (also see Data Set Name)

Data Set Name - Follow TSO/ISPF three-level name format: *Project.Group.Type*. - Ensure that **rightmost** 17 characters, (including periods) will not position a **non-alphabetic** or **non-national** character in byte position 5 in the HDR1 record format (e.g. position 5 **must** have a alphabetic character) to permit use of Standard Label file identification.

External volume number - 6 alphanumeric characters on outside of cartridge and in agreement with internal label.

DCB - include complete data set name, DCB information and a record count externally on cartridges, or in a separate listing if more practical.

Record length - Fixed desired (variable if necessary, IBM only)

Numeric Format - Packed or unpacked

Blocking Factor - must be identified

Block Size - Maximum 32760. Minimum 18. Must be a multiple of the record length.

Character Set - EBCDIC (Extended Binary Coded Decimal Interchange Code)

2. Hard Copy Information Required: In addition to data files previously identified, provide the following in printed form (hard copy).

1. Record layout for all files, including but not limited to the format and length of each field.
2. Field descriptions and values that may appear.
3. Record count for each file (if using FTP) or each cartridge (if external).

3. **IMPORTANT: Personnel Contact** - Please provide the employee name and telephone number of the individual(s) with a working knowledge of the physical data and that was involved in the process which produced the media. It is absolutely necessary for Commission EDP personnel to have unrestricted access to a contact person for the timely resolution of electronic transfer, data processing, and EDP related issues that may arise during the review.

(edpforms/allforms)  
(rev 6-01)

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Audit Request 5 of 6 B

10-1.5 B

SOURCE As referenced





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

11/16  
v. 10/17/02

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 7 DATE OF REQUEST: June 17, 2002

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: July 8, 2002

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

Attached are copies of Document Requests 1, 2, 3, 4, and 6 submitted in October, 2001. Please respond to these requests either by providing the requested information or a specific explanation of why it can not be provided. (This is an administrative request to document telephone conversations that the call detail records on the CDs provided are all that are left of Thrifty Call data/records.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TO: AUDIT MANAGER Denise Vandiver 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 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)

10-1-02

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

Docket No. 000475-TP  
Exhibit DNV-2 (Page 36 of 67  
Staff Audit Work Papers

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 8 DATE OF REQUEST: June 17, 2002

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: July 8, 2002

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. In Docket No. P-447, Sub 5 before the North Carolina Utilities Commission, the Bellsouth Direct Testimony of Jerry Hendrix identified Thrifty Call as a restructured entity named Grande Communications. Please describe, in general terms, the transaction between Thrifty Call, Inc. and Grande Communications Networks, Inc. (i.e., a purchase of assets, a stock purchase, purchase of customers, etc.)

2. Please describe in sufficient detail how the transaction was implemented (i.e. coordination of transfer of assets or customers, etc.)

3. Please also list all officers and key employees of Thrifty Call, Inc., at the time of the transaction, that are currently employed by Grande Communications Networks, Inc.

TO: AUDIT MANAGER Denise Vandiver 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 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)

(PSC/AUS 00 **Thrifty Call, Inc**  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No. 01-292-1-1  
Description: Audit Request 8

10-1,8

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

6/25/04

TO: Floyd Self UTILITY: Thrifty Call

AUDIT MANAGER: Denise Vandiver PREPARED BY: Denise Vandiver

REQUEST NUMBER: 9 DATE OF REQUEST: June 17, 2002

AUDIT PURPOSE: Docket No. 000475-TP; Investigation of Percentage Interstate Usage

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: July 8, 2002

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

When reviewing the call data provided on CD, many lines were blank in the fields designated: anisp, billnum, and clgptyno (see attached printout of all data fields.)

1. Please identify all fields in the files provided that were used to track a call from origination to termination. For all fields used, provide a listing identifying and explaining all values that can be entered into these fields.

2. Numerous calls in the data provided do not appear to have any indication of the origination point. Please explain how Thrifty Call can handle a call without knowing the origination point.

TO: AUDIT MANAGER Denise Vandiver 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 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)

(PSC/AUS 006 REVISED 2/02)

**Thrifty Call, Inc**  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No. 01-292-1-1  
Description: Audit Request

10-1.9

65  
21

LAW OFFICES  
**Messer, Caparello & Self**  
A Professional Association

Post Office Box 1876  
Tallahassee, Florida 32302-1876  
Internet: [www.lawfla.com](http://www.lawfla.com)

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *Letter of Response*

August 30, 2002

**BY HAND DELIVERY**

Ms. Denise Vandiver  
Division of Auditing  
Room 215, Gunter Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 000475-TP

Dear Ms. Vandiver:

Enclosed are Thrifty Call's Responses to Florida Public Service Commission Staff's Audit Requests in the above-referenced docket.

Please call me if you have any questions.

Sincerely yours,

  
Floyd R. Self

TWH/amb  
Enclosures  
cc: Mr. Harold Lovelady

G5  
8/13

Thrifty Call Responses to Staff Audit Requests

Audit Request No. 1. Provide a notarized statement giving authorization to BellSouth to provide all billing records, contracts, audits, test calls, etc. to Commission audit staff.

RESPONSE: Such authorization is attached.

Audit Request No. 2. (1) Provide copies all PIU reports for 1999 and 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(2) Provide all supporting documentation used to generate the reports for April 1999 through March 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(3) Provide all audits performed on the PIU factors (internal and external) during 1999 and 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(4) Provide a list of all internal audits performed in 1999 and 2000 (internal, external, and those provided to legal staff).

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(5) Provide all test calls performed for April 1999 through March 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(6) Provide copies of contracts or agreements with BellSouth.

RESPONSE: Thrifty Call does not have any remaining records that may be responsive to this request. However, Thrifty Call notes that the services obtained from BellSouth were tariff services.

Audit Request No. 3. (1) Provide the names of the carriers (interexchange or otherwise) for which Thrifty Call is terminating traffic to BellSouth.

RESPONSE: The majority of the traffic handled by Thrifty Call was traffic for MCI WorldCom. There was a small amount of Thrifty Call traffic and at one time there was a

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *Continuity of Service*



63  
2/02

very small amount of traffic for an Indianapolis carrier that may have had terminations to BellSouth.

(2) Provide the volume of traffic for each carrier terminated to BellSouth for each month of 1999 and 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(3) Provide copies of any communications and agreements that Thrifty Call has with carriers that involve traffic terminating to BellSouth.

RESPONSE: Thrifty Call has located a document between MCI WorldCom and Thrifty Call that is subject to a nondisclosure agreement. This is the only document we have been able to locate that may be responsive to this request.

(4) Provide copies of any operational documents that describe the terms and conditions of terminating traffic from any other carrier to BellSouth. This is the only document we have been able to locate that may be responsive to this request.

RESPONSE: Thrifty Call has located a document between MCI WorldCom and Thrifty Call that is subject to a nondisclosure agreement.

(5) Provide Traffic Dispersion Reports for 1999 and 2000.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

(6) Provide copies of written internal controls for the Traffic Dispersion Report and for the traffic call processing system.

RESPONSE: Other than what may be on the CD-ROMs already provided to the audit staff, there are no other records that we have been able to locate at this time.

Audit Request No. 4. (1) Provide system documentation depicting the flow of records from the time a record is handed off to Thrifty Call from a carrier until it reaches the Traffic Dispersion Report and from the time that a call is handed off to thrifty Call until it reaches BellSouth.

(2) Provide the source of all call detail records for the Traffic Dispersion Reports.

(3) Provide a list of all modifications to the Report.

(4) Provide a list of major changes in the network or major traffic fluctuations.

(5) Provide a printout and file layout of the January 2000 CDAR tapes.

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company Response 2007



65  
2/6

(6) Provide information about where BellSouth calls are switched and the type of switch(es).

(7) Have available all billing records from April 1999 through March 2000.

RESPONSE FOR (1) THROUGH (7): Thrifty Call has previously provided to the Commission auditors a series of CD-ROMs which contain call detail records and other billing records of the Thrifty Call. If information responsive to (1) through (7) is not contained within those CD-ROMs, then there are no other sources of such records remaining.

Audit Request No. 6. (1) Provide a trial balance for December 31, 1999 and one for March 31, 2000.

RESPONSE: Thrifty Call only has audited financial statements as of December 31, 1999, which are confidential, but which will be provided pursuant to a confidential filing.

(2) Provide a print-out of the Thrifty Call detailed general ledger for each revenue account for April 1999 through March 2000.

RESPONSE: Thrifty Call does not have print outs of these records.

(3) Provide a print-out of the summary of the billing register for each month April 1999 through March 2000.

RESPONSE: Thrifty Call does not have print outs of these records.

Audit Request No. 7. Attached are copies of Document Request 1, 2, 3, 4, and 6 submitted in October, 2001. Please respond to these requests either by providing the requested information or a specific explanation of why it can not be provided. (This is an administrative request to document telephone conversations that the call detail records on the CDs provided are all that are left of Thrifty Call data/records.)

RESPONSE: The response to the individual Document Requests is provided above. The CD-ROMs provided contain all of the remaining call detail records of the company that remain.

Audit Request No. 8. (1) Docket No. P-447, Sub 5 before the North Carolina Utilities Commission, the BellSouth Direct Testimony of Jerry Hendrix identified Thrifty Call as a restructured entity named Grande Communications. Please describe, in general terms, the transaction between Thrifty Call, Inc. and Grande Communications Networks, Inc. (i.e., a purchase of assets, a stock purchase, purchase of customers, etc.).

RESPONSE: Grande Communications is not in any manner a restructured Thrifty Call. In general terms, the transaction between Thrifty Call and Grande was an arms length

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company finance 3 of 7



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9/10

transaction involving the purchase by Grande of some but not all of the assets of Thrifty Call. This sale involved Grande's purchase of switches, Grande's assumption of certain leases and other such obligations, and the acquisition of Thrifty Call's customer base.

(2) Please describe in sufficient detail how the transaction was implemented (i.e., coordination of transfer of assets or customers, etc.).

RESPONSE: See the response to (1) above.

(3) Please also list all officers and key employees of Thrifty Call, Inc., at the time of the transaction, that are currently employed by Grande Communications Networks, Inc.

RESPONSE: Since Thrifty Call has no ongoing business relationship with Grande, Thrifty Call does not have access to, and cannot otherwise identify, those employees of Thrifty Call that are now employed by Grande. However, Thrifty Call can state that at the time of the sale and transfer of assets to Grande by Thrifty Call that approximately 180 Thrifty Call employees were hired by Grande and became employees of Grande.

Audit Request No. 9. When reviewing the call data provided on CD, many lines were blank in the fields designated: anisp, billnum, and clgptyno (see attached printout of all data fields.)

(1) Please identify all fields in the files provided that were used to track a call from origination to termination. For all fields used, provide a listing identifying and explaining all values that can be entered into these fields.

RESPONSE: Thrifty Call has no information regarding these fields or what they mean.

(2) Numerous calls in the data provided do not appear to have any indication of the origination point. Please explain how Thrifty Call can handle a call without knowing the origination point.

RESPONSE: Thrifty Call cannot explain why or why not the records are laid out as they are or why the origination point is not specified in the records. It is possible that some information may not have been passed to Thrifty Call since Thrifty Call did not need the information. For example, Thrifty call notes that because most of the calls handled by Thrifty Call were originated by another IXC, Thrifty Call did not need the originating information in order to terminate a call – call termination only requires the number called.

All responses provided by Harold Lovelady.

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company response 4 of 7



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Telecommunications, Inc. )  
against Thrifty Call, Inc. regarding practices in the ) Docket No. 000475-TP  
reporting of percent interstate usage for compensation )  
for jurisdictional access services. )  
\_\_\_\_\_ )

AUTHORIZATION OF HAROLD LOVELADY

STATE OF TEXAS  
COUNTY OF HAYS

BEFORE ME, an officer duly authorized to administer oaths, personally  
appeared Harold Lovelady, who being duly sworn, states as follows:

1. I am over 21 years of age.
  
2. I am the President of Thrifty Call, Inc., and I have the corporate authority to  
make the authorization provided for in paragraphs 3 and 4 below.
  
3. The Florida Public Service Commission ("FPSC") audit staff has requested that  
I provide authorization to BellSouth for it to provide to the FPSC audit staff  
certain information in connection with its Docket No. 000475-TP.

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company Response 5 of 7

4. Accordingly, pursuant solely to such request, I hereby authorize BellSouth to provide to the FPSC audit staff all billing records, contracts, audits, test calls, and other materials related to BellSouth's claim in FPSC Docket No. 000475-TP. Any documents or other information provided by BellSouth to the FPSC pursuant to this authorization shall be provided pursuant to the following conditions:
- a. Any documents or other information provided by BellSouth to the FPSC pursuant to this authorization shall be limited solely to materials associated with the BellSouth percent interstate usage claims asserted in Docket No. 000475-TP and shall relate to intrastate Florida calls or calls that originate or terminate in the State of Florida.
  - b. All such documents or other information shall be treated as proprietary confidential business information of Thrifty Call and shall be provided to the FPSC pursuant to section 364.183, Florida Statutes, and the rules and regulations of the FPSC relating to the delivery of proprietary confidential business information to the FPSC.
  - c. A copy of any material provided by BellSouth to the FPSC pursuant to this authorization shall be provided to Thrifty Call's counsel of record that is identified in the FPSC's records for Docket No. 000475-TP.

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company for percent of 7

5. This authorization shall be limited solely to the matters related to FPSC Docket No. 000475-TP, and this authorization shall not include authority to BellSouth to release or otherwise provide any Thrifty Call documents or information to any other regulatory agency or other entity.

FURTHER AFFIANT SAYETH NOT.

*Harold Lovelady*

HAROLD LOVELADY

Sworn to and subscribed before me this 8<sup>th</sup> day of August, 2002.

*Helen Hobbs*

Notary Public, State of Texas



Personally Known ✓

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Company terms 01/07

LAW OFFICES  
**MESSER, CAPARELLO & SELF**  
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE (850) 222-0720  
TELECOPIER (850) 224-4359  
INTERNET: www.lawfla.com

January 25, 2002

**Thrifty Call, Inc**  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: *Letter of Confidentiality*

**BY HAND DELIVERY**

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

RE: Docket No. 000475-TP  
Thrifty Call's Claim for Confidential Treatment; Call Detail Records

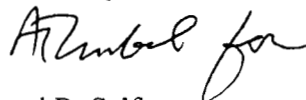
Dear Ms. Bayó:

Thrifty Call, Inc., pursuant to Section 364.183(1), Florida Statutes, hereby claims that certain information provided to Staff on the two enclosed Call Detail Records CD-ROMs, contain confidential and proprietary business information that should be held exempt from public disclosure. Pursuant to Rule 25-22.0006(5), Florida Administrative Code, in the attached envelope are the two CD-ROMs of Thrifty Call, Inc. containing the confidential information. Because these are raw call detail records that we are unable to print out, there is no redacted copy.

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

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self  
Counsel for Thrifty Call, Inc.

FRS/amb  
Enclosures

cc: Ms. Denise Vandiver  
Danny Adams, Esq.  
Mr. Harold Lovelady

RECEIVED

JAN 28 2002

Florida Public Service Commission  
Division of Auditing and Safety



State of Florida



Docket No. 000475-TP  
Exhibit DNV-2 (Page 47 of 67)  
Staff Audit Work Papers

Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

GJ  
3/03

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**DATE:** February 4, 2002  
**TO:** Kay Flynn; Division of Commission Clerk and Administrative Services  
**FROM:** Denise Vandiver; Division of Auditing and Safety *DV*  
**RE:** Docket No. 000475-TP; Confidential Document No. 00984-02

---

On January 25, 2002, Thrifty Call responded to an audit request. Instead of providing the information to the auditor, the company filed the information with the Division of Commission Clerk and Administrative Services and the disks were logged in as Document No. 00984-02 (Certain information on two Call Detail Records.) Please return these disks to the company. I talked with Floyd Self and he asked that when they are ready to be released that we call him or his secretary to have them picked up.

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000475 Audit Control No. 01-292-1-1  
Description: Confidential (Memo)

SOURCE As Referenced

11-2



AUDIT POINT SHEET

Docket No.: 000475  
 Company: Thrifty Call  
 Reviewed By: Lynn M. Deamer

Audit Control No.: 01-292-1-1  
 Audit Manager: Mike Buckley  
 Date Reviewed: June 23, 2004

Point Number	Working Paper	Review Comments	Disposition	Corrected by/ Date
1	Audit Report	Make changes as noted	Done	MB 6/25
2	6	Need to do evaluation of edp	Done	MB 6/25
3	10-2.3	Mentions Audit Request 7, 8, 9: I know audit request 7 was a letter or something from Denise. Do we have this in the files? What about 8 and 9? These need to be accounted for and referenced on the document request log.	Denise not in files	MB 6/28
4	44,45	There is not sufficient for the oddness of this audit of referencing or sourcing. I know that 45 was schedules provided by EDP? And that 44 was based on these schedules? Also, I want you to do a lead sheet for the work performed. It can cover 44 and 45 series. Basically, say that the data obtained, problems found, work performed and conclusions reached. Otherwise, what would you annotate some of the conclusions in the audit report to?	Lead Sheet done MB 6/28	MB 6/28
5				



TO AVOID PENALTY AND INTEREST CHARGES, THE REGULATORY ASSESSMENT FEE RETURN MUST BE FILED ON OR BEFORE 01/30/2001

**Interexchange Company Regulatory Assessment Fee Return**

STATUS:

- Actual Return
- Estimated Return
- Amended Return

PERIOD COVERED:  
 01/01/2000 TO  
 12/31/2000

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000475 Audit Control No. 01-292-1-1  
 Description: RAF Form Yr 2000

TI352  
 Thrifty Call, Inc.  
 401 Carlson Circle  
 San Marcos, TX 78666-6730  
 DEPOSIT DATE  
 D045 MAR 27 2001

mission  
 of Form)

FOR PSC USE ONLY  
 Check# 34678  
 \$ 50.00 0603001  
 \$ 5.00 003001  
 \$ 1.00 P 0603001  
 004011  
 Postmark Date 3/19/01  
 Initials of Preparer MC

Please Complete Below If Official Mailing Address Has Changed

56 Lovelady Management, 125 Moore St., Ste. 101 San Marcos, TX 78666  
 (Name of Company) (Address) (City/State) (Zip)

LINE NO.	ACCOUNT CLASSIFICATION	FLORIDA	
		GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Long Distance Services	\$ <u>10,809,127</u>	\$ <u>0</u>
2.	Access Services		<u>0</u>
3.	Private Line Services		<u>0</u>
4.	Leased Facilities & Circuits Services		<u>0</u>
5.	Miscellaneous Services		<u>0</u>
6.	TOTAL Telephone Services	\$ <u>10,809,127</u>	\$ <u>0</u>
7.	LESS: Amounts Paid to Other Telecommunications Companies* (see "2. Fees" on back)	( )	( <u>0</u> )
8.	TOTAL REVENUES For Regulatory Assessment Fee Calculation		<u>0</u>
9.	Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015)		<u>50.00</u>
10.	Penalty for Late Payment (see "3. Failure to File by Due Date" on back)		<u>5.00</u>
11.	Interest for Late Payment (see "3. Failure to File by Due Date" on back)		<u>1.00</u>
12.	TOTAL AMOUNT DUE		\$ <u>56.00</u>

\* These amounts must be intrastate only and must be verifiable.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

CURRENT COMPANY STATUS

- Facilities-Based Carrier
- Reseller
- Call Aggregator
- Alternate-Operator Service
- Rebiller
- Other: \_\_\_\_\_

BILLING INFORMATION

Complete below if billing agent if other than yourself.

(Name) (Address: City/State/Zip) (Telephone)  
 What is the total amount of customer deposits collected? Amount: \$ 0 for 1st 2000  
 What is the total amount of bond held (if applicable)? Amount: \$ \_\_\_\_\_ Expires: \_\_\_\_\_

COMPANY INFORMATION

Do you lease telecommunications' facilities?  YES  NO  
 If YES, who do you lease these facilities from? Name: \_\_\_\_\_  
 Address: \_\_\_\_\_

I, the undersigned owner/officer of the above-named company, have read the foregoing and declare that to the best of my knowledge and belief the above information is a true and correct statement. I am aware that pursuant to Section 837.06, Florida Statutes, whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his/her duty shall be guilty of a misdemeanor of the second degree.

James A. Silvis  
 (Signature of Company Official)

Senior Vice President 3/18/01  
 (Title) (Date)

James A. Silvis  
 (Preparer of Form - Please Print Name)

Telephone Number (512) 472 2350 Fax Number (512) 472 3599

F.E.I. No. 43-1596154

**Thrifty Call**  
**Actual Percentage Interstate Usage Audit**  
**Period Ending March 31, 2000**  
**Docket No. 000475-TP Audit Control No. 01-292-1-1**

**SUBJECT:** Actual Percentage Interstate Usage

**OBJECTIVE:** To audit call data and source documentation to determine actual percentage interstate usage (PIU) for year ended March 31, 2000.

**WORK SUMMARY:** The first six Document Requests were sent to the Company on October 24, 2001. Document Requests 7, 8, and 9 were sent June 17, 2002. A letter of response was received on August 30, 2002 including a CD with information on <sup>TCM</sup> it. The CD only included data for July 1, 1999 through December 31, 1999. EDP scheduled the calls for these dates on a daily basis. They were separated between calls that had or did not have enough information to determine if the call should be Interstate or Intrastate. The auditor then compiled these calls by Month, by number, by number of minutes. Also, a percentage of PIU was determined by month and then for the entire period.

**CONCLUSION:** The Percentage Of Interstate Usage for July 1, 1999 through December 31, 1999 is 19.51%. 37.99% of the calls during this time period did not have enough information to determine if it was Interstate or Intrastate.

**44 LEAD**

**SOURCE:** As referenced.

Thrifty Call, Inc.  
 Docket: 000475-TP  
 ACN: 01-292-1-1

A:SS1 Monthly Average.123

Determination of actual PIU

Monthly Average for July through December 1999

	July Monthly Total	No. of Days in July	July Average	August Monthly Total	No. of Days in August	August Average	September Monthly Total	No. of Days in September	September Average
Noinfo record count	1,744,363	31	56,269	1,754,676	31	56,602	1,837,940	30	61,264
Sinfo record count	3,859,921	31	124,513	3,695,049	31	119,195	3,378,834	30	112,627
Total	5,604,284	31	180,782	5,449,725	31	175,797	5,216,774	30	173,892
Inter record count	193,316	31	6,236	172,014	31	5,548	316,127	30	10,537
Intra record count	3,666,605	31	118,277	3,523,035	31	113,646	3,062,707	30	102,090
Total	3,859,921	31	124,513	3,695,049	31	119,195	3,378,834	30	112,627
Inter call duration	621,917.388	31	20,061.851	650,452.861	31	20,982.350	1,278,627.956	30	42,620.931
Intra call duration	11,387,621.410	31	367,342.626	11,621,548.661	31	374,888.666	9,668,745.375	30	322,291.512
Total	12,009,538.805	31	387,404.477	12,272,001.524	31	395,871.016	10,947,373.337	30	364,912.444
	October Monthly Total	No. of Days in October	October Average	November Monthly Total	No. of Days in November	November Average	December Monthly Total	No. of Days in December	December Average
Noinfo record count	2,638,110	31	85,100	2,395,298	30	79,843	2,262,648	31	72,988
Sinfo record count	3,362,044	31	108,453	3,186,270	30	106,209	3,135,038	31	101,130
Total	6,000,154	31	193,553	5,581,568	30	186,052	5,397,686	31	174,118
Inter record count	794,046	31	25,614	813,024	30	27,101	814,583	31	26,277
Intra record count	2,567,998	31	82,839	2,373,246	30	79,108	2,320,455	31	74,853
Total	3,362,044	31	108,453	3,186,270	30	106,209	3,135,038	31	101,130
Inter call duration	3,597,477.653	31	116,047.666	3,749,336.964	30	124,977.899	3,584,587.865	31	115,631.867
Intra call duration	7,953,598.183	31	256,567.683	7,546,347.193	30	251,544.906	7,434,562.210	31	239,824.587
Total	11,551,075.837	31	372,615.350	11,295,684.158	30	376,522.805	11,019,150.078	31	355,456.454

To 99 end

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000475 Audit Control No: 01-292-1-1  
 Description: Monthly Average

Exhibit DNV-2 (Page 52 of 67)  
 Staff Audit Work Papers

47

11/15  
 11/15

Thrifty Call, Inc.  
 Docket: 000475-TP  
 ACN: 01-292-1-1

A:SS2 Average minutes.123

Determination of actual PIU

Average Minutes per Call for July through December 1999

	<u>July</u> <u>Monthly Total</u>	<u>August</u> <u>Monthly Total</u>	<u>September</u> <u>Monthly Total</u>	<u>October</u> <u>Monthly Total</u>	<u>November</u> <u>Monthly Total</u>	<u>December</u> <u>Monthly Total</u>
<b>Inter record count</b>	193,316	172,014	316,127	794,046	813,024	814,583
<b>Intra record count</b>	3,666,605	3,523,035	3,062,707	2,567,998	2,373,246	2,320,455
<b>Total</b>	3,859,921	3,695,049	3,378,834	3,362,044	3,186,270	3,135,038
<b>Inter call duration</b>	621,917.388	650,452.861	1,278,627.956	3,597,477.653	3,749,336.964	3,584,587.865
<b>Intra call duration</b>	11,387,621.410	11,621,548.661	9,668,745.375	7,953,598.183	7,546,347.193	7,434,562.210
<b>Total</b>	12,009,538.805	12,272,001.524	10,947,373.337	11,551,075.837	11,295,684.158	11,019,150.078
<b>Average Minutes For:</b>						
<b>Inter call</b>	3.22	3.78	4.04	4.53	4.61	4.40
<b>Intra call</b>	3.11	3.30	3.16	3.10	3.18	3.20
<b>Total</b>	3.11	3.32	3.24	3.44	3.55	3.51

*75442001*

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No. 01-292-1-1  
 Description: 1-31-99

*2/19/00*

*1-4-00*

Thrifty Call, Inc.  
 Docket: 000475-TP  
 ACN: 01-292-1-1

A:SS3 Percent of Total.123

Determination of actual PIU

Percent of Total analyses for July through December 1999

	July <u>Monthly Total</u>	Percent to <u>Total in July</u>	August <u>Monthly Total</u>	Percent to <u>Total in August</u>	September <u>Monthly Total</u>	Percent to <u>Total in September</u>
Noinfo record count	1,744,363	31.13%	1,754,676	32.20%	1,837,940	35.23%
Sinfo record count	3,859,921	68.87%	3,695,049	67.80%	3,378,834	64.77%
<b>Total</b>	<b>5,604,284</b>	<b>100.00%</b>	<b>5,449,725</b>	<b>100.00%</b>	<b>5,216,774</b>	<b>100.00%</b>
<b>Inter record count</b>	<b>193,316</b>	<b>5.01%</b>	<b>172,014</b>	<b>4.66%</b>	<b>316,127</b>	<b>9.36%</b>
<b>Intra record count</b>	<b>3,666,605</b>	<b>94.99%</b>	<b>3,523,035</b>	<b>95.34%</b>	<b>3,062,707</b>	<b>90.64%</b>
<b>Total</b>	<b>3,859,921</b>	<b>100.00%</b>	<b>3,695,049</b>	<b>100.00%</b>	<b>3,378,834</b>	<b>100.00%</b>
<b>Inter call duration</b>	<b>621,917.388</b>	<b>5.18%</b>	<b>650,452.861</b>	<b>5.30%</b>	<b>1,278,627.956</b>	<b>11.68%</b>
<b>Intra call duration</b>	<b>11,387,621.410</b>	<b>94.82%</b>	<b>11,621,548.661</b>	<b>94.70%</b>	<b>9,668,745.375</b>	<b>88.32%</b>
<b>Total</b>	<b>12,009,538.805</b>	<b>100.00%</b>	<b>12,272,001.524</b>	<b>100.00%</b>	<b>10,947,373.337</b>	<b>100.00%</b>
	October <u>Monthly Total</u>	Percent to <u>Total in October</u>	November <u>Monthly Total</u>	Percent to <u>Total in November</u>	December <u>Monthly Total</u>	Percent to <u>Total in December</u>
Noinfo record count	2,638,110	43.97%	2,395,298	42.91%	2,262,648	41.92%
Sinfo record count	3,362,044	56.03%	3,186,270	57.09%	3,135,038	58.08%
<b>Total</b>	<b>6,000,154</b>	<b>100.00%</b>	<b>5,581,568</b>	<b>100.00%</b>	<b>5,397,686</b>	<b>100.00%</b>
<b>Inter record count</b>	<b>794,046</b>	<b>23.62%</b>	<b>813,024</b>	<b>25.52%</b>	<b>814,583</b>	<b>25.98%</b>
<b>Intra record count</b>	<b>2,567,998</b>	<b>76.38%</b>	<b>2,373,246</b>	<b>74.48%</b>	<b>2,320,455</b>	<b>74.02%</b>
<b>Total</b>	<b>3,362,044</b>	<b>100.00%</b>	<b>3,186,270</b>	<b>100.00%</b>	<b>3,135,038</b>	<b>100.00%</b>
<b>Inter call duration</b>	<b>3,597,477.653</b>	<b>31.14%</b>	<b>3,749,336.964</b>	<b>33.19%</b>	<b>3,584,587.865</b>	<b>32.53%</b>
<b>Intra call duration</b>	<b>7,953,598.183</b>	<b>68.86%</b>	<b>7,546,347.193</b>	<b>66.81%</b>	<b>7,434,562.210</b>	<b>67.47%</b>
<b>Total</b>	<b>11,551,075.837</b>	<b>100.00%</b>	<b>11,295,684.158</b>	<b>100.00%</b>	<b>11,019,150.078</b>	<b>100.00%</b>

July Lead

FF-2

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No: 01-292-1-1  
 Description: Percent of Total in the Month

2/2/01

m

Thrifty Call, Inc.  
 Docket: 000475-TP  
 ACN: 01-292-1-1

A:SS4 Percent of Grand Total.123

Determination of actual PIU  
 Percent of Grand Total for July through December 1999

	July to December <u>Total</u>	Percent to Total <u>July to December</u>
Noinfo record count	12,633,035	37.99%
Sinfo record count	20,617,156	62.01%
<b>Total</b>	<b>33,250,191</b>	<b>100.00%</b>
Inter record count	3,103,110	15.05%
Intra record count	17,514,046	84.95%
<b>Total</b>	<b>20,617,156</b>	<b>100.00%</b>
Inter call duration	13,482,400.687	19.51%
Intra call duration	55,612,423.032	80.49%
<b>Total</b>	<b>69,094,823.739</b>	<b>100.00%</b>

*Disclosed in  
 to the Grand Total*

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No. 000471 Audit Control No. 01-292-1-1  
 Description: Grand Total

44-3

Prepared by Auditor

**Thrifty Call**

Analysis of call data from July 1 through December 31, 1999

Call_Info	July 1 (182)		July 2 (183)		July 3(184)		July 4(185)		July 5(186)		July 6(187)		July 7(188)		July 8(189)	
	COUNT															
NOINF	65396		67117		32390		20131		33877		64408		66940		65164	
SINFO	145022		144963		78132		60996		89477		152040		151150		153025	
TOTAL	210418		212080		110522		81127		123154		216448		218090		218189	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	7431	19,391.644	7580	17,555.488	2537	13,313.506	1986	12,467.435	3237	14,776.035	7741	19,011.388	6455	18,439.577	7138	17,756.041
INTRA	137591	422,315.577	137403	393,861.100	75595	251,428.291	59010	200,364.816	86240	283,684.777	144299	421,125.737	144695	424,829.962	145887	429,073.218
TOTAL	145022	441,707.221	144963	411,416.588	78132	264,741.797	60996	212,832.251	89477	298,460.812	152040	440,137.126	151150	443,269.540	153025	446,829.259
Call_Info	Aug 1(213)		Aug 2(214)		Aug 3(215)		Aug 4(216)		Aug 5(217)		Aug 6(218)		Aug 7(219)		Aug 8(220)	
NOINF	22852		65301		68859		72619		69727		72764		37884		23817	
SINFO	68849		145591		143451		139949		140498		139567		82352		67830	
TOTAL	91701		210892		212310		212568		210225		212331		120236		91647	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	2407	19,468.321	6414	20,464.001	7426	20,528.268	6810	19,837.481	6770	19,869.296	6306	18,368.966	3624	16,708.640	2409	18,508.874
INTRA	66442	282,190.434	139177	419,297.021	136025	408,331.468	133139	411,746.430	133728	407,057.765	133261	388,435.012	78728	269,977.966	65421	285,460.251
TOTAL	68849	301,658.755	145591	439,761.021	143451	428,859.736	139949	431,583.911	140498	426,927.061	139567	406,803.978	82352	286,686.606	67830	303,969.125

Thrifty Call, Inc  
 P/U Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No: 01-2921-1  
 Description: Monthly

Reported by Auditor  
 ESO

7044

0/9/04  
 NIF

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Thrifty Ca  
Analysis o

Call_Info	July 9(190)		July 10(191)		July 11(192)		July 12(193)		July 13(194)		July 14(195)		July 15(196)		July 16(197)	
NOINF	64273		37374		22439		61982		67857		65199		66893		65470	
SINFO	150245		84746		66101		149321		146518		143723		146412		142867	
TOTAL	214518		122120		88540		211303		214375		208922		213305		208337	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	7330	17,578.149	4447	15,582.160	2256	15,629.460	7612	19,421.439	6528	17,485.613	7417	18,526.773	7591	18,509.688	8280	20,625.866
INTRA	142915	395,606.929	80299	274,604.727	63845	277,081.110	141709	425,892.323	139990	418,198.164	136306	418,151.096	138821	416,459.523	134587	393,859.329
TOTAL	150245	413,185.078	84746	290,186.888	66101	292,710.570	149321	445,313.762	148518	435,683.777	143723	436,677.870	146412	434,969.211	142867	414,485.195
Call_Info	Aug 9(221)		Aug 10(222)		Aug 11(223)		Aug 12(224)		Aug 13(225)		Aug 14(226)		Aug 15(227)		Aug 16(228)	
NOINF	65544		69882		70773		71857		71531		41765		24674		68820	
SINFO	147838		141001		140922		139704		141956		78870		64430		139046	
TOTAL	213382		210883		211695		211561		213487		120635		89104		205866	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	7978	21,168.092	8712	22,345.744	8930	22,087.855	6932	20,184.768	8994	22,081.542	4495	20,491.474	2919	22,323.121	7613	23,845.050
INTRA	139860	416,793.964	132289	412,374.722	131992	413,552.983	132772	412,453.014	132962	389,374.370	74375	280,233.596	61511	285,229.285	131433	411,427.996
TOTAL	147838	437,962.056	141001	434,720.466	140922	435,640.838	139704	432,637.782	141956	411,455.912	78870	300,725.071	64430	307,552.406	139046	435,273.046

Thrifty Call, Inc  
 P10 Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No: 01-202-1-1  
 Description:

7044

Prepared by Auditor

45-1

07/09/99



Thrifty Ca  
Analysis o

July 17(198)			July 18(199)		July 19(200)		July 20(201)		July 21(202)		July 22(203)		July 23(204)		July 24(205)	
Call_Info	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
NOINF	36983		24042		62848		68065		69670		74351		70686		41483	
SINFO	81100		64525		152866		145222		146497		145739		147056		84769	
TOTAL	118083		88567		215714		213287		216167		220090		217742		126252	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	5552	21,633.745	3227	25,947.240	8941	26,199.180	7669	25,337.293	7818	23,793.659	7785	24,104.678	7536	23,100.212	4923	25,561.983
INTRA	75548	273,919.358	61298	265,381.261	143925	430,640.958	137553	423,445.161	138679	422,197.648	137954	416,848.445	139520	399,551.777	79846	281,141.463
TOTAL	81100	295,553.103	64525	291,328.501	152866	456,840.138	145222	448,782.454	146497	445,991.307	145739	440,953.124	147056	422,651.989	84769	306,703.427
Aug 17(229)			Aug 18(230)		Aug 19(231)		Aug 20(232)		Aug 21(233)		Aug 22(234)		Aug 23(235)		Aug 24(236)	
Call_Info	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
NOINF	72442		71675		72521		66860		29428		14301		59233		65282	
SINFO	134016		132716		135753		136357		77980		62629		138480		141025	
TOTAL	206458		204391		208274		203217		107408		76930		197713		206307	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	7034	23,037.077	5570	22,222.360	5058	19,743.204	5074	19,111.014	3832	19,564.679	2705	21,772.523	6119	22,417.519	4993	23,037.942
INTRA	126982	412,128.739	127146	405,481.420	130695	410,171.473	131283	399,727.580	74148	281,941.992	59924	291,200.497	132361	431,896.464	136032	433,261.938
TOTAL	134016	435,165.816	132716	427,703.780	135753	429,914.677	136357	418,838.595	77980	301,506.671	62629	312,973.020	138480	454,313.982	141025	456,299.880

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No: 01-292-1-1  
Description: For Call

7044

Approved by Auditor

45-2

Thrifty Ca  
Analysis o

July 25(206)			July 26(207)		July 27(208)		July 28(209)		July 29(210)		July 30(211)		July 31(212)		Monthly Total		
Call_Info	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
NOINF	24304		67119	26,038.783	74292	24,296.352	76241	21,252.854	71861	18,690.801	71678	17,547.252	44032	16,780.260	1,744,363	621,917.388	NOINF
SINFO	70353		148328	416,187.911	148069	424,274.541	146070	414,342.671	145676	420,474.866	144034	388,557.101	84879	275,340.184	3,859,921	11,387,621.410	SINFO
TOTAL	94657		215447	442,226.695	222361	448,570.893	222311	435,595.525	217537	439,165.667	215712	406,104.353	128911	292,100.444	5,604,284	12,009,538.805	TOTAL
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
INTER	3322	25,582.854	8927	26,038.783	7352	24,296.352	7537	21,252.854	6893	18,690.801	6606	17,547.252	3682	16,780.260	193,316	621,917.388	INTER
INTRA	67031	288,781.386	139401	416,187.911	140717	424,274.541	138533	414,342.671	138783	420,474.866	137428	388,557.101	81197	275,340.184	3,666,605	11,387,621.410	INTRA
TOTAL	70353	314,364.240	148328	442,226.695	148069	448,570.893	146070	435,595.525	145676	439,165.667	144034	406,104.353	84879	292,100.444	3,859,921	12,009,538.805	TOTAL
Aug 25(237)			Aug 26(238)		Aug 27(239)		Aug 28(240)		Aug 29(241)		Aug 30(242)		Aug 31(243)		Monthly Total		
Call_Info	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
NOINF	69492		69848	19,200.066	69476	20,140.203	33028	21,617.060	14311	23,377.659	62584	23,534.942	67526	22,291.175	1,754,676	650,452.861	NOINF
SINFO	135374		137317	420,882.666	131905	396,058.939	76263	298,665.571	59224	288,704.674	135653	421,447.405	138503	417,904.846	3,695,049	11,621,548.661	SINFO
TOTAL	204866		207165	440,082.732	201381	416,199.143	109291	320,282.632	73535	312,082.333	198237	444,982.347	206029	440,196.021	5,449,725	12,272,001.524	TOTAL
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
INTER	5323	21,103.945	5163	19,200.066	5031	20,140.203	3752	21,617.060	2868	23,377.659	5653	23,534.942	5100	22,291.175	172,014	650,452.861	INTER
INTRA	130051	418,138.180	132154	420,882.666	126874	396,058.939	72511	298,665.571	56356	288,704.674	130000	421,447.405	133403	417,904.846	3,523,035	11,621,548.661	INTRA
TOTAL	135374	439,242.125	137317	440,082.732	131905	416,199.143	76263	320,282.632	59224	312,082.333	135653	444,982.347	138503	440,196.021	3,695,049	12,272,001.524	TOTAL

7044

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45-3

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No: 01-292-1-1  
Description: April 02

Prepared by Auditor

**Thrifty Call**  
Analysis of call data from July 1 through December 31, 1999

Call_Info	Sep 1(244)		Sep 2(245)		Sep 3(246)		Sep 4(247)		Sep 5(248)		Sep 6(249)		Sep 7(250)		Sep 8(251)	
	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
NOINF	66119		64152		59776		26013		12194		13230		57869		61157	
SINFO	140889		133533		121852		59024		44110		54063		123743		120685	
<b>TOTAL</b>	<b>207008</b>		<b>197685</b>		<b>181628</b>		<b>85037</b>		<b>56304</b>		<b>67293</b>		<b>181612</b>		<b>181842</b>	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	4671	20,791.921	5070	17,613.942	3990	13,725.212	2623	15,024.096	1847	14,830.065	2063	16,773.888	4578	18,140.870	4468	16,966.820
INTRA	136218	423,183.768	128463	398,569.861	117862	339,698.569	56401	215,097.630	42263	194,454.990	52000	235,488.932	119165	363,620.049	116217	365,126.837
<b>TOTAL</b>	<b>140889</b>	<b>443,975.690</b>	<b>133533</b>	<b>416,183.803</b>	<b>121852</b>	<b>353,423.781</b>	<b>59024</b>	<b>230,121.727</b>	<b>44110</b>	<b>209,085.055</b>	<b>54063</b>	<b>252,260.821</b>	<b>123743</b>	<b>381,760.919</b>	<b>120685</b>	<b>382,093.657</b>
Call_Info	Oct 1(274)		Oct 2(275)		Oct 3(276)		Oct 4(277)		Oct 5(278)		Oct 6(279)		Oct 7(280)		Oct 8(281)	
NOINF	97906		80818		33194		97208		103640		110405		99859		99889	
SINFO	125895		83723		60686		118433		119348		117891		119647		120939	
<b>TOTAL</b>	<b>223801</b>		<b>164541</b>		<b>93880</b>		<b>215641</b>		<b>222988</b>		<b>228296</b>		<b>219506</b>		<b>220828</b>	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	27734	103,976.913	19702	111,772.148	16126	132,374.965	27934	108,113.413	27049	106,818.496	26599	105,058.030	26991	108,066.908	27952	109,647.108
INTRA	98161	271,645.199	64021	210,602.496	44580	214,760.282	90499	281,553.160	92299	278,059.766	91292	279,348.259	92656	278,838.710	92987	274,959.707
<b>TOTAL</b>	<b>125895</b>	<b>375,622.112</b>	<b>83723</b>	<b>322,374.645</b>	<b>60686</b>	<b>347,135.247</b>	<b>118433</b>	<b>389,666.573</b>	<b>119348</b>	<b>384,878.262</b>	<b>117891</b>	<b>384,406.290</b>	<b>119647</b>	<b>386,905.618</b>	<b>120939</b>	<b>384,606.815</b>

7044

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No: 01-292-1-1  
Description: 1/3/00

Prepared by Auditor  
45-4

Prepared by Audit Log

Thrifty Ca  
Analysis o

Call_Info		Sep 9(252)		Sep 10(253)		Sep 11(254)		Sep 12(255)		Sep 13(256)		Sep 14(257)		Sep 15(258)		Sep 16(259)	
NOINF	66488			64883				32112									
SINFO	126441			120311				70682		15646	62719	49863	50987	145516		67385	
TOTAL	192929			185194			102794	69379	191564	128845	169918	196503	151157	218542			

Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	4240	14,724.167	3138	12,505.538	2403	14,472.903	2105	18,025.680	3813	20,766.611	5496	32,602.291	5738	24,994.835	5017	20,057.371
INTRA	122201	362,670.040	117173	344,550.814	68279	243,792.137	51628	271,884.710	125032	390,804.432	114559	385,744.110	139778	418,484.683	146140	433,167.251
TOTAL	126441	377,394.208	120311	357,056.352	70682	258,265.040	53733	289,910.390	128845	411,571.043	120055	418,346.401	145516	443,479.518	151157	453,224.622

Call_Info		Oct 9(282)		Oct 10(283)		Oct 11(284)		Oct 12(285)		Oct 13(286)		Oct 14(287)		Oct 15(288)		Oct 16(289)	
NOINF	76115			33547				101492									
SINFO	80195			63087				123905		105559	105251	97735	127928	97735	61909	89005	
TOTAL	156310			96634			220534	225397	231786	232438	225663	150914					

Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	22710	118,378.752	17798	137,137.449	26337	113,027.705	27611	112,148.095	29952	108,219.700	28494	108,104.252	29036	113,090.173	22110	134,405.516
INTRA	57485	214,541.734	45289	203,846.789	96584	277,480.574	96294	275,986.475	96275	270,440.930	98691	281,482.159	98892	282,693.600	66895	251,232.148
TOTAL	80195	332,920.485	63087	340,984.238	122921	390,508.279	123905	388,134.570	126227	378,660.630	127185	389,586.411	127928	395,783.773	89005	385,637.664

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No. 000471 Audit Control No. 01-292-1-1  
Description: AWH/ly

7044

45-5

Prepared by Auditor

Thrifty Ca  
Analysis o

Sep 17(260)			Sep 18(261)			Sep 19(262)			Sep 20(263)			Sep 21(264)			Sep 22(265)			Sep 23(266)			Sep 24(267)		
Call_Info																							
NOINF	67810		30721		17060		57210		141696		70969		79041		103834		103442		103442		103442		
SINFO	147828		82805		60535		141696		198906		145688		147486		129407		130686		130686		130686		
TOTAL	215638		113526		77595		198906		216657		226527		233241		234128								
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	
INTER	4240	17,377.041	2328	16,488.224	2371	21,620.688	4164	18,872.284	4340	20,834.321	5384	18,506.222	28377	96,070.364	28787	99,806.491							
INTRA	143588	406,453.976	80477	293,941.661	58164	294,148.552	137532	418,087.063	141348	433,675.544	142102	416,245.831	101030	275,039.949	101899	262,278.046							
TOTAL	147828	423,831.018	82805	310,429.886	60535	315,769.240	141696	436,959.346	145688	454,509.865	147486	434,752.053	129407	371,110.313	130686	362,084.538							
Oct 17(290)			Oct 18(291)			Oct 19(292)			Oct 20(293)			Oct 21(294)			Oct 22(295)			Oct 23(296)			Oct 24(297)		
Call_Info																							
NOINF	31164		96631		102622		105740		106522		101679		68990		32204		32204		32204		32204		
SINFO	68914		124260		126679		130337		127123		127777		87171		62650		62650		62650		62650		
TOTAL	100078		220891		229301		236077		233645		229456		156161		94854								
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	
INTER	19762	143,660.271	28605	112,798.012	30039	111,089.667	29576	108,580.295	29196	108,706.356	30583	109,052.815	23859	118,980.428	17940	135,631.378							
INTRA	49152	213,714.498	95655	278,766.074	96640	274,506.324	100761	278,921.188	97927	277,737.363	97194	270,646.665	63312	212,612.407	44710	208,769.795							
TOTAL	68914	357,374.769	124260	391,564.086	126679	385,595.991	130337	387,501.483	127123	386,443.719	127777	379,699.480	87171	331,592.836	62650	344,401.173							

To 44

Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No: 01-292-1-1  
Description: 4 W: 1000

Prepared by: [Name]

**Thrifty Ca  
Analysis o**

		Sep 25(268)		Sep 26(269)		Sep 27(270)		Sep 28(271)		Sep 29(272)		Sep 30(273)		Monthly Total		Call_Info			
Call_Info																			
NOINF		85407		30269		97987		105884		108301		109412		1,837,940		NOINF			
SINFO		91085		66272		128587		130086		130448		131586		3,378,834		SINFO			
<b>TOTAL</b>		<b>176492</b>		<b>96541</b>		<b>226574</b>		<b>235970</b>		<b>238749</b>		<b>240998</b>		<b>5,216,774</b>		<b>TOTAL</b>			
<b>Category</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Category</b>	<b>Count</b>	<b>Minutes</b>		
INTER	28807	113,542.856	22759	136,753.812	30086	108,947.140	31952	108,288.226	31426	105,417.151	29846	104,286.926	316,127	1,278,627.956	INTER	316,127	1,278,627.956		
INTRA	62278	207,984.177	43513	195,248.920	98501	267,159.134	98134	263,966.470	99022	271,116.416	101740	277,062.823	3,062,707	9,668,745.375	INTRA	3,062,707	9,668,745.375		
<b>TOTAL</b>	<b>91085</b>	<b>321,527.033</b>	<b>66272</b>	<b>332,002.732</b>	<b>128587</b>	<b>376,106.274</b>	<b>130086</b>	<b>372,254.696</b>	<b>130448</b>	<b>376,533.567</b>	<b>131586</b>	<b>381,349.749</b>	<b>3,378,834</b>	<b>10,947,373.337</b>	<b>TOTAL</b>	<b>3,378,834</b>	<b>10,947,373.337</b>		
		Oct 25(298)		Oct 26(299)		Oct 27(300)		Oct 28(301)		Oct 29(302)		Oct 30(303)		Oct 31(304)		Monthly Total		Call_Info	
Call_Info																			
NOINF		92698		100603		96713		103728		92689		79120		24867		2,638,110		NOINF	
SINFO		125842		122626		126178		126530		129481		84213		65148		3,362,044		SINFO	
<b>TOTAL</b>		<b>218540</b>		<b>223229</b>		<b>222891</b>		<b>230358</b>		<b>222170</b>		<b>163333</b>		<b>90015</b>		<b>6,000,154</b>		<b>TOTAL</b>	
<b>Category</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Count</b>	<b>Minutes</b>	<b>Category</b>	<b>Count</b>	<b>Minutes</b>		
INTER	28505	109,630.367	26059	113,665.751	27863	113,725.471	28063	105,785.920	29986	110,984.341	22395	122,699.819	17480	142,147.139	INTER	794,046	3,597,477.653		
INTRA	97337	271,813.130	96567	275,172.895	98315	275,440.445	98567	277,467.585	99495	272,610.834	61818	206,004.240	47668	211,942.752	INTRA	2,567,998	7,953,598.183		
<b>TOTAL</b>	<b>125842</b>	<b>381,443.497</b>	<b>122626</b>	<b>388,838.646</b>	<b>126178</b>	<b>389,165.917</b>	<b>126630</b>	<b>383,253.504</b>	<b>129481</b>	<b>383,595.175</b>	<b>84213</b>	<b>328,704.058</b>	<b>65148</b>	<b>354,089.891</b>	<b>TOTAL</b>	<b>3,362,044</b>	<b>11,551,075.837</b>		

7,449

45-7

Thrifty Call Inc  
 PDU Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No: 01-292-1-1  
 Description:

**Thrifty Call**

Analysis of call data from July 1 through December 31, 1999

Call_Info	Nov 1(305)		Nov 2(306)		Nov 3(307)		Nov 4(308)		Nov 5(309)		Nov 6(310)		Nov 7(311)		Nov 8(312)	
NOINF	84967		90460		97674		99540		107745		70298		26065		97023	
SINFO	127023		124254		122910		118803		120826		79054		64672		119335	
TOTAL	211990		214714		220584		218343		228571		149352		90737		216358	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	28509	111,670.345	28206	116,848.015	26590	116,294.446	26929	112,717.684	27761	109,120.581	22549	129,418.472	20310	148,804.679	28301	117,585.676
INTRA	98514	279,773.669	96048	276,037.260	96320	276,304.044	91874	273,607.562	93065	263,649.781	56505	208,515.766	44362	202,393.819	91034	272,100.012
TOTAL	127023	391,444.014	124254	392,885.275	122910	392,598.490	118803	386,325.246	120826	372,770.362	79054	337,934.237	64672	351,198.498	119335	389,685.688
Call_Info	Dec 1(335)		Dec 2(336)		Dec 3(337)		Dec 4(338)		Dec 5(339)		Dec 6(340)		Dec 7(341)		Dec 8(342)	
NOINF	87408		102050		92957		61193		24645		85002		93640		93714	
SINFO	118832		116601		118508		83506		65467		119559		122120		119704	
TOTAL	206240		218651		211465		144699		90112		204561		215760		213418	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes
INTER	27076	118,718.716	28717	114,414.911	31222	116,525.213	26561	133,731.107	21358	150,131.019	29380	118,542.975	31618	122,740.895	31203	117,960.382
INTRA	91756	272,141.254	87884	270,037.437	87286	259,851.351	56945	217,722.527	44109	209,376.635	90179	271,565.129	90502	275,155.327	88501	273,706.143
TOTAL	118832	390,859.970	116601	384,452.348	118508	376,376.564	83506	351,453.633	65467	359,507.654	119559	390,108.104	122120	397,896.222	119704	391,666.525

Thrifty Call, Inc  
 PTU Audit Period Ending March 31, 2000  
 Docket No. 000471 / Audit Control No. 01-292-1-1  
 Description:

227,135  
 639,162  
 2049,555.8  
 3040,3040

114

Property of ...

**Thrifty Ca**  
Analysis o

		Nov 9(313)		Nov 10(314)		Nov 11(315)		Nov 12(316)		Nov 13(317)		Nov 14(318)		Nov 15(319)		Nov 16(320)	
Call_Info																	
NOINF	97732			99880		98493		92152		71262		26736		89233		96828	
SINFO	121687			120821		123419		121641		81520		70310		120756		119182	
TOTAL	219419			220701		221912		213793		152782		97046		209989		216010	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	
INTER	29305	117,030.923	29857	115,635.156	30120	123,795.990	30662	114,106.229	26156	122,994.816	25189	155,773.017	30568	121,477.313	30171	121,608.490	
INTRA	92382	275,624.965	90964	272,459.243	93299	281,920.450	90979	266,677.308	55364	198,087.570	45121	207,354.505	90188	277,898.689	89011	273,447.739	
TOTAL	121687	392,655.888	120821	388,094.400	123419	405,716.440	121641	380,783.537	81520	321,082.386	70310	363,127.522	120756	399,376.002	119182	395,056.229	
		Dec 9(343)		Dec 10(344)		Dec 11(345)		Dec 12(346)		Dec 13(347)		Dec 14(348)		Dec 15(349)		Dec 16(350)	
Call_Info																	
NOINF	101347			88118		68251		27822		84132		90635		94764		91246	
SINFO	120627			123501		84953		65909		120752		118209		121615		119822	
TOTAL	221974			211619		153204		93731		204884		208844		216379		211068	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	
INTER	31718	115,438.980	34803	117,110.455	27767	126,827.413	22042	140,971.980	31720	118,479.366	29358	113,649.255	34237	115,204.253	32252	114,588.954	
INTRA	88909	273,549.369	88698	262,811.215	57186	208,887.392	43867	205,266.648	89032	269,479.848	88851	274,545.730	87378	267,131.803	87570	261,686.811	
TOTAL	120627	388,988.350	123501	379,921.670	84953	335,714.805	65909	346,238.628	120752	387,959.215	118209	388,194.985	121615	382,336.057	119822	376,275.765	

Thrifty Call, Inc  
 PIU Audit Period Ending March 31, 2000  
 Docket No: 000471 Audit Control No. 01-202-1-1  
 Description: Available

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Call_Info		Nov 25(329)	Nov 26(330)	Nov 27(331)	Nov 28(332)	Nov 29(333)	Nov 30(334)	Monthly Total	
NOINF	19208	87386	67875	27624	86840	89027	2,395,298	NOINF	
SINFO	65047	108330	79548	62811	120410	118789	3,186,270	SINFO	
TOTAL	84255	195716	147423	90435	207250	207816	5,581,568	TOTAL	
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
INTER	25223	179,257.661	30386	116,463.254	23818	124,054.162	18193	141,982.847	INTER
INTRA	39824	174,078.609	77944	223,996.534	55730	193,323.897	44618	199,060.133	INTRA
TOTAL	65047	353,336.270	108330	340,459.788	79548	317,378.059	62811	341,042.981	TOTAL
		Monthly Total							
Call_Info	Dec 25(359)	Dec 26(360)	Dec 27(361)	Dec 28(362)	Dec 29(363)	Dec 30(364)	Dec 31(365)	Monthly Total	
NOINF	18798	30646	75977	75141	82340	76525	42445	2,262,648	NOINF
SINFO	49681	59966	107526	95691	94755	95670	74194	3,135,038	SINFO
TOTAL	68479	90612	183503	170832	177095	172195	116639	5,397,686	TOTAL
Category	Count	Minutes	Count	Minutes	Count	Minutes	Count	Minutes	Category
INTER	17610	162,844.533	17026	125,973.912	23707	92,425.590	18767	76,930.536	INTER
INTRA	32071	155,491.788	42940	181,498.140	83819	236,203.587	76924	226,951.175	INTRA
TOTAL	49681	318,336.322	59966	307,472.052	107526	328,629.177	95691	303,881.712	TOTAL

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Thrifty Call, Inc  
PIU Audit Period Ending March 31, 2000  
Docket No: 000471 Audit Control No: 01-292-1-1  
Description: AMR 1/2/00