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Part 1 of 2 DOCUMENT NUMBER-DATE

02769 MAR-18

FPSC-RECORDS/REPORTING

WORLDCOM TECHNOLOGIES

TITLE:

INDEX OF CONFIDENTIAL WORKPAPERS

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998

FLOW THROUGH REDUCTIONS

DATE:

FEBRUARY 8, 2000

AUDITOR:

RKY

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FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF AUDITING AND FINANCIAL ANALYSIS BUREAU OF AUDITING

Miami District Office

WORLDCOM TECHNOLOGIES, INC.

FLOW-THROUGH OF SWITCHED ACCESS RATE REDUCTIONS

JULY 1, 1998 OCTOBER 1, 1998

AUDIT CONTROL NO. 99-078-4-2

CONFIDENTIAL

Ruth K. Young, Audit Manager

Kathy L. Welch, Audit Supervisor

CONFIDENTIAL

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DIVISION OF AUDITING AND FINANCIAL ANALYSIS AUDITOR'S REPORT

February 10, 2000

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to audit the accompanying Flow-Through Work Sheets dated July 1, 1998 and October 1, 1998 submitted by WorldCom Technologies. These Flow-Through Work Sheets were provided in support of their estimated monthly and annualized savings because of reduced access charges that were to be passed on the customer. We have also applied procedures to determine if, in fact, the savings on the submitted Work Sheets were passed through to the customer.

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

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

SUMMARY OF SIGNIFICANT PROCEDURES

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

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

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

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

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

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

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

JULY 1, 1998 FLOW- THROUGH WORK SHEET

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

OCTOBER 1, 1998 FLOW-THROUGH WORK SHEET

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

Traced the study period estimated Intrastate Minutes of Use to company provided printouts and detail of its CABS Switched Access Cost Reports.

Agreed estimated intrastate monthly revenues on the Flow-Through Work Sheet to the company printout of WorldOne Revenue Base and Company Revenue Summaries. The scope was limited because we did not review the company data base. However, we did compare customer bills before and after the decrease.

The Interexchange Carrier rate change for each rate element was recalculated using the prior tariff and the new tariff except for the "WNS Transcend" tariff which are contract rates for resellers.

New and revised tariffs in effect prior to July 1, 1998 and after October 1, 1998 were read to determine if there were possible increases prior to the reductions and possible increases after the reductions.

TEST OF CUSTOMER INVOICES

Selected four of the eight rate elements that were decreased for testing. Obtained bills for the same customers for a month after the July 1, 1998 reduction and a month after the October 1, 1998 reduction to compare the amounts billed to the Interexchange Carrier tariffs.

The scope was limited because the company could not provide us the information necessary to determine if the rates billed to the customer agreed to the tariff for two rate elements. Audit Disclosure 2 addresses this.

AUDIT DISCLOSURE 1

SUBJECT:

TARIFF CHANGES

STATEMENT OF FACTS: Staff reviewed the tariffs from WorldCom that were in effect prior to the July 1, 1998 and after October 1, 1998 in order to determine if any of the tariffs that were decreased on the "Flow- Through Work Sheets" for access charge reductions were increased prior to the reduction and/or increased after the flow-through to the customers. The tariffs that were changed prior to the reductions and after the reductions are noted below.

WorldOne Service Dedicated and Switched

Tariffs submitted to the Commission show that there was an increase in this tariff on April 10, 1998 prior to the flow through reductions on July 1, and October 1, 1998. The PSC order requiring the first reduction was issued June 8, 1998. Also, this same tariff was increased effective May 18, 1999. Schedule 1 attached to this disclosure shows the increases and decreases. The April, July and October tariffs were never put into effect. The WorldOne Service customers were billed the October 1, 1996 tariff from October 1, 1996 through May 1999. Audit Disclosure 2 explains the details and the effect on the customers.

Biztel BUS 17

This rate element was not reduced in the July 1, 1998 reduction. This element was reduced on the October 1, 1998 Flow Through Work Sheet. Tariffs submitted to the Commission on May 13, 1998 showed an increase in the "all other times" rate prior to the October 1, 1998 reduction. Schedule 2 attached to this disclosure shows the increases and decreases.

COMPANY: TITLE: PERIOD:

WORLDCOM TECHNOLOGIES CHANGES IN TARIFFS PRIOR TO AND AFTER JULY AND OCTOBER RATE REDUCTIONS JANUARY 25, 2000

DATE:

SCHEDULE 1 TO DISCLOSURE 1

WORLD ONE SERVICE	FPSC Tariff No 4 3RD Revised Sheet 165	FPSC Tariff No 4 4th Revised Sheet 165	FPSC Tariff No 4 5th Revised Sheet 165	FPSC Tariff No 4 6th Revised Sheet 165	4.FPSC Tariff No 4. 7th Revised Sheet 165		
INTERLATA**	10/1/96	4/10/98	7/1/98	10/1/98	5/18/99		
Switched Per Minute]						
Monthly Outbound	0.1395	0.1562	0.1464	0.1376	0.1477		
Monthly Inbound	0.1485	0.1630	0.1559	0.1465	0.1573		
12 Month ESP Out and In	0.1350	0.1512	0.1418	0.1333	0.1430		
24 Month ESP Out and In	0.1305	0.1462	0.1371	0.1289	0.1382		
Dedicated Per Minute							
Monthly Outbound	0.0990	0.1139	0.1068	0.1047	0.1048		
Monthly Inbound	0.1080	0.1242	0.1164	0.1141	0.1144		
12 Month ESP Out and In	0.0945	0.1087	0.1019	0.0999	0.1001		
24 Month ESP Out and In	0.0900	0.1035	0.0970	0.0951	0.0953		

^{**} Intralata rates were not reduced on the Interexchange Flow Through Work Sheets in July or October 1998.

COMPANY: TITLE: PERIOD:

DATE:

WORLDCOM TECHNOLOGIES

CHANGES IN TARIFFS

PRIOR TO AND AFTER JULY AND OCTOBER

RATE REDUCTIONS JANUARY 25, 2000

SCHEDULE 1 TO DISCLOSURE 1

SCHEDULE 2 TO DISCLOSURE 1

October 1, 1996 May 13, 1998

BUS 17 SERVICE

3rd Revised 4TH Revised 5th Revised Sheet No. 23.1 Sheet No. 23.1

October 1, 1998

DAY 7A.M. TO 7.P.M. ALL OTHER TIMES

0.1700 0.1500 0.1700 0.1700 0.1030 0.1030

AUDIT DISCLOSURE 2

SUBJECT:

SAMPLE OF INVOICES

STATEMENT OF FACTS: The company reduced eight specific rate elements to pass through the Local Exchange Company Access Charge reductions to its customers. Four rate elements were selected. The rates before and after the October 1, 1998 reduction were tested. These are "WTI WorldOne Switched and Dedicated Service", "Classic Carrier Service" and "WNS Transcend."

As explained below, there were discrepancies in the tariffs compared with what the company was billing its customers for two rate elements. Also, it was not possible to determine if the customer was billed the reduced rates for two other rate elements. Therefore, the company was asked to review the amounts billed to its customers for the other four rate elements included on the Interexchange Flow-Through Work Sheets. The review of these other four elements will be addressed in a supplemental audit.

"WTI WorldOne Switched and Dedicated Service" (2 elements)

On the October 1, 1998 Interexchange Carrier Flow-Through Work Sheet the WTI WorldOne element accounted for the total monthly estimated reduction of the total estimated monthly reduction of the total by 1, 1998 Flow-Through Work Sheet was the total estimated monthly reduction of the total estimated monthly reduction of the Interexchange Flow-Through Work Sheet, staff tested September and November 98 invoices to customers. It was determined that the customer was being billed the tariff in effect October 1, 1996 for both months tested. The company representative said that the increase submitted to the Commission effective April 10, 1998, and the decreases submitted effective July 1, 1998 and October 1, 1998 were never billed to the customers. The company representative also said that the customer was billed the October 1, 1996 rate until May, 1999.

Calculation of the amount that was not passed through to the customers is on Schedule 1 attached to this disclosure.

WTI WORLDONE SWITCHED AND DEDICATED SERVICE OPINION: Since the company did not flow through its reductions calculated on the Interexchange Carrier Flow-Through Work Sheets, the Customers did not benefit from the reductions. Based on the attached schedule, arrangements should be made to pass through to the customers.

"Classic Carrier Service"

On the October 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the control of the total monthly reduction of the total mon

Invoices for the month of September and November 98 were selected to determine if the July 1 and October 1, 1998 reductions went into effect. The review of the invoices showed that the data was summarized by either originating or terminating information. There was no data on the invoices that would allow a determination of a billed rate per minute. The company provided us with further detail for one of the sample accounts. However, we still could not determine a rate per minute to agree with the tariff. A company representative then told us that the "Classic Carrier Service" is a "carrier to carrier" service and most carriers are on a special contract arrangement. This means that they are sometimes billed a lower rate than the tariff. The company representative said that it is difficult to determine the rate per minute from the detail of the invoices.

CLASSIC CARRIER SERVICE OPINION: Because of the method of billing its customers and detail format provided by the company, we could not determine if the customers were billed the reduced rates.

"WNS Transcend"

On the October 1, 1998 Interexchange Carrier Flow-Through Work Sheet the WNS Transcend element accounted for of the total estimated reduction of the total estimated amount on the July 1, 1998 Flow-Through Work Sheet was \$22,030 of the total estimated reduction estimated reduction

The company explained that the "WNS Transcend" rate element is a contract with resellers. The resellers get three different parts on their bill. Two parts are access fees, originating and terminating and the third part is the long distance element. The access fee reduction goes straight to the reseller.

In order to determine if the rates were reduced, the contracts with the resellers were requested to determine the prior rates and the new rates. The company representative said the contracts were generic and we would not see rates, but there was a clause that says that any access fee reductions from the local Exchange Companies would be passed through to the customer. The company representative said that they would only provide the generic contract to order to maintain the necessary confidentiality of very sensitive information.

Through discussion with company personnel, we were provided with company calculations for the July and October 1998 reductions to try to determine if the access fee reduction was in fact passed through to its "WNS Transcend" customers.

We were also provided with invoices for two Transcend customers. As with the Classic Carrier invoices, the data was summarized by either originating or terminating information. There was no data on the invoices that would allow a determination of a billed rate per minute. The company could not supply any more detail.

WNS TRANSCEND SERVICE OPINION: Calculations for the GTE reduction as it applies to the Transcend element show that the reduction by WorldCom was very close to the reduction in the GTE tariff. The Sprint tariff and the company calculations were not close. The reduction to the WorldCom customer was higher than was called for in the Sprint tariff. The company explained that there could be many reasons why the customer received a higher reduction. It might be that the customer was over-billed in prior month in error and the customer was getting the credit along with the reduction for the access charged making the rate lower. The company representative could not provide a reasons for the discrepancy. We can conclude, though, that the reduction calculated by the company to be billed the customer is much lower than the reduction called for in the Sprint tariff.

Although we could determine that a rate reduction was calculated, we did not have the invoice data to show that the Transcend rate was billed to the customers.

TITLE:

WORLDCOM TECHNOLOGIES

CALCULATION OF WORLDONE SERVICE REDUCTION

PERIOD:

JULY 1 AND OCTOBER 1, 1998

DATE:

JANUARY 31, 2000

AUDITOR:

RKY

SCHEDULE 1 TO DISCLOSURE 2

IXC WorkSheet

IXC WorkSheet October 1, 1998

Company Calculated

Flow-Through

July 1, 1998 **Estimated Monthly**

Estimated Monthly

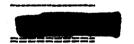
Reduction

Reduction

Total

Rate Element WTI World One Switched WTI WorldOne Dedicated WTC World One*

Times 12 for the yearly effect



Audit Disclosures 3 and 4 would have the net effect of reducing this amount by

^{*} Not separated between switched and dedicated on the IXC Flow-Through Work Sheet.

AUDIT DISCLOSURE 3

SUBJECT: STUDY PERIOD INTRASTATE MINUTES OF USE ON OCTOBER 1, 1998 FLOW THROUGH WORKSHEET

STATEMENT OF FACTS: The company calculated the monthly dollar savings to the Interexchange Carrier from the Local Exchange companies by applying the rate change from the Local Exchange companies to a monthly estimated number of Intrastate Minutes of Use. The result is the monthly reduction to pass through to its customers. The company source documentation for the estimated number of Minutes of Use did not agree with the Minutes of Use on the Flow-Through Work Sheet.

Recalculation of the Flow-Through Work Sheet based on company source documentation shows that the company overestimated its monthly savings in the amount of the per month or every year. This calculation is presented on the attached schedules.

However, recalculation of the flow-through work sheet based on "Actual" Minutes of Use' provided by the company shows that the company would not have passed through enough of a reduction to the customer. This calculation is on the attached schedule. The use of "Actual" Minutes of Use shows its monthly savings to be underestimated. The effect of this is to pass on less to the customer than the reduction received from the Local Exchange Companies. The net of these two calculations shows a shortage of the customer for the year. The calculations are on the attached schedule.

COMPANY: TITLE:

WORLDCOM TECHNOLOGIES OCTOBER 1, 1998 FLOW THRU

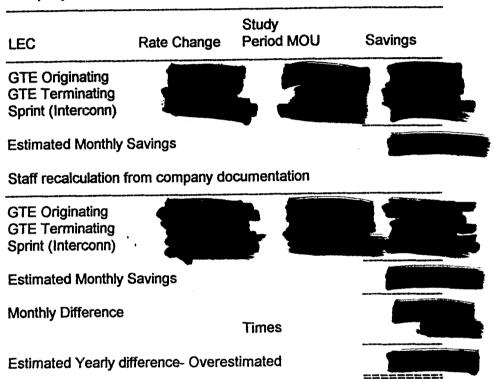
WORKSHEET DISCLSORES FOR THE

STUDY PERIOD INTRASTATE

MINUTES OF USE.

PERIOD: DATE: OCTOBER 1, 1998 SEPTEMBER 7, 1999

Company Calculation According to the Flow Through Worksheet



COMPANY: TITLE:

WORLDCOM TECHNOLOGIES OCTOBER 1, 1998 FLOW THRU

WORKSHEET DISCLSORES FOR THE

STUDY PERIOD INTRASTATE

MINUTES OF USE.

PERIOD: DATE: OCTOBER 1, 1998 SEPTEMBER 7, 1999

Staff Calculation based on Company Source Documentation

LEC

Rate Change

Study Period MOU

Savings

GTE Originating GTE Terminating Sprint (Interconn)





Estimated Monthly Reduction

Staff recalculation based on company actual data

GTE Originating GTE Terminating Sprint (Interconn)



Monthly Reduction based on actual data

Monthly Difference

Times

12

Yearly net shortage

AUDIT DISCLOSURE 4

SUBJECT:

INTEREXCHANGE CARRIER RATE CHANGES

OCTOBER 1, 1998

STATEMENT OF FACTS: The company used predetermined percent changes to the IXC rates on the flow through worksheet to calculate the monthly rate reduction to its customers for eight separate rate elements. Staff reviewed both the prior tariffs and tariffs effective October 1, 1998 to recalculate the Interexchange Carrier rate changes.

For two rate elements, the percent used by the company did not reconcile to the tariffs. These are "Biztel Bus 17 Service" and "Classic Carrier Service." The company reduced "Biztel" and "Classic Carrier" in the amount of Recalculation of the prior and new tariffs indicate that these rate elements are reduced by a second description.

Flow Through IXC Rate Change

Staff Calculated IXC Rate Change Per Tariff

Biztel Bus 17 Classic Carrier





OPINION: Staff's calculation would have the effect of creating a larger reduction for Biztel Bus 17 and a smaller reduction for Classic Carrier Service. The net effect as calculated on the attached schedules creates a larger reduction to customers in the amount of

WORLDCOM TECHNOLOGIES

TITLE:

OCTOBER 1, 1998 FLOW THRU WORKSHEET DISCLOSURES for IXC Rate Change Percents

PERIOD:

OCTOBER 1, 1998

DATE:

SEPTEMBER 7, 1999

AUDITOR:

RKY

The company used predetmined % changes to the IXC rates for flow thru and applied them to estimated revenues to come up with their estimated reduction. In order to determine if the company applied these percent reductions, staff determined the prior tariff and new tariff as of October 1, 1998 and calculated the percent reduction with the following results:

The predetermined percent reductions were reflected in the tariff of all the rate elements on the October 1, 1998 IXC Flow Thru worksheet except for two elements which are Biztel BUS 17 and Classic Carrier Service.

BIZTEL BUS 17

		•
Tariff May 13, 1998 Tariff Sept 30, 1998		cents cents
Reduction	0.07	cents
divide by	0.17	cents
%Tariff Change	39.41%	•

The difference in the reduction is as follows:

Rate Element	Flow Through IXC Rate Change	Staff Calculated IXC Rate Change Per Tariff	Difference
Biztel Bus17			
Co Estimated Monthly Intrastate Revenue *			
Reduction Rev * % Change			
	Annualize for 12 r	months	12
Add shortage calculate in the amount of	alted for Classic Ca	rrier on next schedule	per year per year

^{*} According to October 1, 1998 Flow Thru Worksheet

COMPANY: **WORLDCOM TECHNOLOGIES** OCTOBER 1, 1998 FLOW THRU WORKSHEET EXCEPTIONS AND DISCLOSURES for IXC Rate Change Percents TITLE: **OCTOBER 1, 1998** PERIOD: DATE: SEPTEMBER 7, 1999 **RKY** AUDITOR: reduction was calculated using a prior For the Classic Carrier Service reduction of rate that is not in the tariff. When using the prior rate that is in the tariff the reduction is: Weighted Documentation sent by the company: Dedicated Switched Avg. Prior Proposed Divide by Reduction % Weighted Dedicated **Switched** According to the tariffs Avg. Prior **Proposed** Divide by Reduction % IXC Flow Thru Work Sheet Estimated monthly revenue for Classic Carrier Service Intrastate Revenue Percent determined Amount used on Flow thru work sheet Difference undetermined Intrastate Revenue Staff % determined IL COK DCM) Annualize for 12 months

Annual reduction shortage

EXHIBITS

CORRECTED VERSION IXC Flow- Through Work Sheet

Name(s) of IXC: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI National, Inc.

Study Period (one or more months in 1998): July

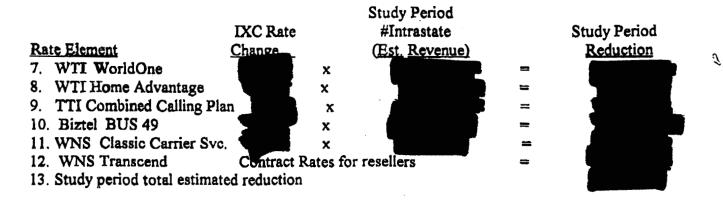
Calculation of S Savings and Percent Reduction

				Study Period # Intrastate Est.					
LE	<u>C</u>	Rate Change	x	Minutes (MOUS)	=Sw. Acc. Savings				
1.	GTE	\$0.0022555 (Orig. CCL)	x		=				
2.		\$0.0034969 (Term. CCL)	X		=				
3.	Sprint	\$0.00295 (Interconnection)	x		=				
4.	Total Sv	v. Acc. Savings (Sum lines 1-3)			-				
	study pe	le intrastate long distance riod billable revenue			Not Applicable				
6.	Required	i % reduction in IXC's FL intra-	-						
	state lon	g distance rates (line 4/line 5)			N.A.				

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

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

Monthly Savings Spread Over Specific Rate Elements



IXC Summary

IXCs: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc.

(WNS); Biztel Corp.; TTI National, Inc.

Effective date of flow-through:

July 1, 1998

Percentage Reduction of IntraLATA toll rates

WorldCom only reduced interLATA rates for World One. For the other products WorldCom has only one rate schedule, therefore the percent reduction for intraLATA was no greater than interLATA.

Determination of Residence & Business Calculation

WorldCom determined what percentage of our Florida market was attributed to Commercial, Residential, Biztel, and Wholesale sectors. Then the total savings were allocated between each sector based on this percentage and then flowed through in the products listed. WorldOne, Biztel BUS 49, TTI's Combined Calling Plan, Classic Carrier Service, and Transcend products are part of the "business rate" summary below. Home Advantage is in the "residential rate" summary below. Please note that the Transcend product is a non-tariffed contract service for resellers.

IXC Flow-Through Summary

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

*TTI is classified as Business in the IXC Flow Through Summary, but has some residential traffic.

IXC Flow-Through Work Sheet

Name(s) of IXC: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI National, Inc.

Study Period (one or more months in 1998):

July Average

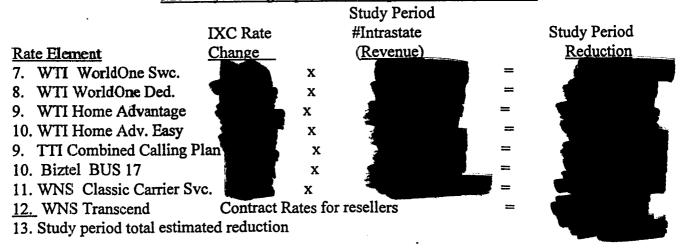
Calculation of \$ Savings and Percent Reduction

<u>LE</u> 1. 2. 3.	CC GTE Sprint	Rate Change \$0.0042878 (Orig. CCL) \$0.0066423 (Term. CCL) \$0.005554 (Interconnection)	x x x x	Study Period # Intrastate Est. Minutes (MOUS)	=Sw. Acc. Savings
4.	Total Sw.	Acc. Savings (Sum lines 1-3)			= \$
	study peri	intrastate long distance od billable revenue			Not Applicable
6.		% reduction in IXC's FL intra- distance rates (line 4/line 5)	-		N.A.

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

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

Monthly Savings Spread Over Specific Rate Elements



IXC Summary

IXCs: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI National, Inc.

Effective date of flow-through:

October 1, 1998

Percentage Reduction of IntraLATA toll rates

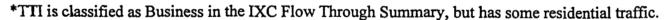
WorldCom has only one rate schedule, therefore the percent reduction for intraLATA was no greater than interLATA.

Determination of Residence & Business Calculation

WorldCom determined what percentage of our Florida market was attributed to Commercial, Residential, Biztel, and Wholesale sectors. Then the total savings were allocated between each sector based on this percentage and then flowed through in the products listed. WorldOne, Biztel BUS 17, TTI's Combined Calling Plan, Classic Carrier Service, and Transcend products are part of the "business rate" summary below. Home Advantage is in the "residential rate" summary below. Please note that the Transcend product is a non-tariffed contract service for resellers.

IXC Flow-Through Summary

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



1	F	1			AFEN	3	1 14	NDARD INDEX
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	a			1		N D	B	
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'rom: Ruth Young

o: Kathy Welch
bipect: IXC Flow Through Audits

:==NOTE===========

:C: Denise Vandiver

This is to confirm our conversation of coday. I received a call from Julie Davis ate yesterday saying that she did not have my information for me at this time, but could have it available by December 20. If this is the case I will need until the ciddle of January to go through the sample and resolve any differences which I am sure cill occur. We all agreed that this was OK out did not set a date. What about January 4 or 17? .4 or 17?

Iso, we decided that this was the last time re were going to extend the document request the dates and I was going to inform the company that if we did not receive the information at that time I would recommend come type of penalty in my report.

Tulie Davis is not in today. I will call tere tomorrow and let her know.

lease let me know what due date you prefer.

CONFIDENTIAL





From: Ruth Young

Co: Kathy Welch
Subject: IXC Flow Through Audits

C: Denise Vandiver

this is a follow up to my memo to you of November 15,1999 detailing the problems.

NORLDCOM TECHNOLOGIES - There were three items in that memo that were outstanding.

- We did not receive the sample for the World One Switched Services rate element. le still did not receive it as of today.
- For the Classic Carrier Serivce sample items were were not able to tell where the calls were originated and terminated to letermine the rates used. We still did not receive this information as of today.
- . For the WNS Transcend Rate Element I vrote another request on November 11, 1999. Cheir response was they were looking into it and would get back to us the week of November 29. We have not heard anything further as of today.

4CI WORLDCOM --

- 1. The sample for execunet service is completed. Two weeks ago I requested in explanation for five discrepancies. have not heard anything to date.
- 3. We received what the company states are the correct invoices for the VNET business element. I plan to audit these tomorrow.
- I left a message for Julie Davis today asking for firm dates for the rest of the asking for firm dates for the rest of the information. The audit is due December 20. Without the above information, I cannot complete it by then. The company has not responded in a timely manner to any of our requests during this audit and I don't expect them to start now. What are your suggestions?

CONFIDENTIAL

000029

Page: 1



MEMORANDUM

NOVEMBER 15, 1999

TO:

KATHY WELCH

FROM:

RUTH YOUNG

Re:

IXC ACCESS CHARGE FLOW THROUGH REDUCTIONS

TO CUSTOMERS

Attached is an update of the problems I have been having with my audits of WorldCom Technologies and MCI Worldcom. After you read this, let's discuss our alternatives. We could write up a report of what we have so far and continue on with the audit or just extend the audit so that we can get all the information we need to draw a conclusion. Even if we extend, I believe we will still have the certain scope limits as discussed on the attached update.

Attachment

cc: Denise Vandiver

CONFIDENTIAL



S-| 000030



PROGRESS REPORT - As of November 15, 1999 AUDITS OF IXC FLOW THROUGH WORKSHEETS RKY 11/15/99

PROGRESS REPORT - As of November 15, 1999 AUDITS OF IXC FLOW THROUGH WORKSHEETS RKY 11/15/99

WORLDCOM TECHNOLOGIES

I requested a sample of one residential and one business rate element to test whether the tariff was reduced. The request was submitted on October 1, 1999.

- A. Residential "World One Switched Ser vices". We have not received any sample to date.
- B. Business- "Classic Carrier Service". We received the sample on November 10, 1999. It was not possible

to tell where the calls were originated and terminated to determine the rates used. The company is exploring the invoices to determine if there is a way I can audit them and get the information we need.

C. There was also a rate element on the flow through work sheet where the company said they would reduce

rates for contract customers. I requested documentation on September 14, 1999 (prior and new contracts that add up to the amount of the reduction). The company said that they were too sensitive and confidential and that even if we got them they would only say that any reductions from the LECs for access charges would be flowed through to them.

I said to them OK let me see the bills from these companies that would show that a reduction included on the flow through work sheets took place. (The reduction for these contract customers is the total flow through reduction). I also asked for the calculations that were made to come up with these contract reductions. My impression was either they did not want to give them to us or they were not available. On November 12, I received a sample invoice for one customer. This bill is in the same format as the Classic Carrier Service noted above and therefore cannot determine the tariff charged.

These conversation occurred over a period of time and unfortunately they were not confirmed in writing.

I don't see, even if I could read the invoices, how I could tell if the amount the company said they reduced their contract rates is the amount on the bills without a calculation of how much each contract should be reduced.

Without the companies calculations for the contract reductions, we cannot audit whether it happened or not. This is definitely a company imposed scope limitation. Should I again ask them for the calculations, or just write up an audit exception.

MCI WORLDCOM

I requested a sample of one residential and one business rate element to test whether the tariff was reduced. The request was submitted on October 29, 1999.

A. Residential - Execunet Service

Received the sample on November 15, 1999. It appears we can calculate the tariff reductions from the way the bills are presented. I have not audited this sample yet.





PROGRESS REPORT - As of November 15, 1999 AUDITS OF IXC FLOW THROUGH WORKSHEETS RKY 11/15/99

B. Business - VNET Service

I received the sample on November 9, 1999. We requested the month of September 98 and the month of May 99 to test the reductions of 7/98 and 10/98.

Our review of the sample to date showed that for the invoices dated 9/10/98 (August 98 calls), that FI Intrastate, interlata and intralata calls did not match the tariff .The tariff included the 7/98 flow through reduction. The customers tariff was higher. The company explained that the rate may have been changed on a later invoice with a credit for the months that the customer was not billed the reduced rate. The company is in the process of exploring what may have happened. We asked the company to provide the invoices for the month the reduced tariff went into effect showing the credit, the calculation of the credit, and the reduced tariff for FI to FI calls. We do not know when this will be available yet. This was requested on November 11, 1999.

Also for the 5/10/99 invoices, the tariff that the company billed the customers was higher than the tariff in effect. The tariff they were supposed to use to bill the customers in this time period included the 10/98 reduction. The company explained that maybe the tariff was increased after the 10/98 reduction. They were going to explore this. However, I asked the company to provide invoices for the month the tariff went into effect showing the credit, the calculation of the credit if applicable, and the reduced tariff for FI to FI calls. We do not know when this will be available yet. This was requested on November 11, 1999.

CONFIDENTIAL





rom: Ruth Young

'o: Denise Vandiver

Subject:

Worldcom IXC Flow Thru Worksheets

Audit.

:C: Kathy Welch

called Brian Sulmonetti again today Tuesday) and left another voice mail. I m still waiting to hear from him about when should be receiving the sample invoices.

When the second is the second in the second is a second in the second in

CONFIDENTIAL



com: Ruth Young

o: Kathy Welch
abject: IXC Flow Through audits

: Denise Vandiver

e: WorldCom - I requested the sample on tober 1, 1999. At that time Biran ilmonetti said that it would take three to num weeks to get the bills. It is now by weeks to get the bills. It is now by weeks to get the bills. It is now by weeks to and I have not received the ample items. I spoke with Brian last week to the said he would check on it. I called a magain this morning asking for a definite ite. I have not heard from his yet. It is definitely need an extension on this Il definitely need an extension on this dit. When I know the date I will receive he bills, I will be better able to stimate.

MCI WorldCom - I requested the sample october 28, 1999. Julie Davis at MCI did that I should have the sample by exember 15. As I am going on vacation moreomer 22 through December 3, I mobably will finish the sample by December 1. I would like to due date extended to comber 13. Thank you cember 13. Thank you.

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iği.

rinted by Ruth Young

9/03/99

7:55am

From: Denise Vandiver

To:

Charleston Winston, James McPherson, Kathy Welch, Rhonda Hicks Subject: fwd: IXC

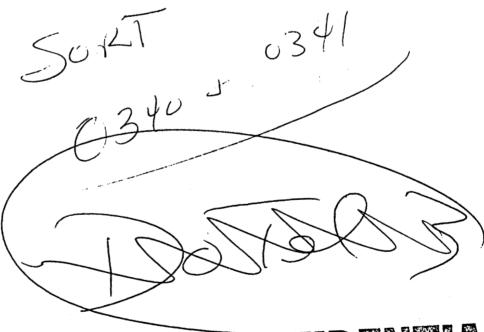
I was talking with Edward about the IXC audit he is performing and he stumbled on (or investigated shrewdly) the fact that the IXC happened to increase the tariffed rates in March (during the legislative session) about the same amount as the rate reduction in July. SO, in addition to looking for rate increases after the pass through reduction, you may want to think about rate increases prior to the pass-through. This is not easy on big companies, but the small and mid-size may be possibilities.

Fwd=by:=Kathy=Welch===8/12/99==7:31am== Fwd to:

Gabriela Leon, Iliana Piedra, Ruth Young

This affects your audits. You can call Edward and ask what he's doing if you want. Maybe you could conference call together.







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

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TO: Orean Julmonelle	-
FROM: Kuck Gown	•
(AUUII MANAGER)	(AUDITOR PREPARING REQUEST)
REQUEST NUMBER: 2, 3, 4 54 4	DATE OF REQUEST: 8/12/19
AUDIT PURPOSE: Txc + How + tun	
REQUEST THE FOLLOWING ITEM(S) BE PRO	VIDED BY: (Ling 16, 17 12 18)
REFERENCE RULE 25-22,006, F.A.C., TH	IS REQUEST IS MADE: INCIDENT TO AN INQUIRY
	OUTSIDE OF AN INQUIRY
ITEM DESCRIPTION:	
<u></u>	
Please answer the allacte	J requests 23,45 +6
TO: AUDIT MANAGER Ruth Young	O.L.T.
	DATE:
THE REQUESTED RECORD OR DOCUMENTATION:	
(1) HAS BEEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT	
(3) XI AND IN MY OPINION. ITEM(S) // IS (ARE) F 364.183, 366.083, OR 367.156, F.S. TO MAINTAIN CONTIN MUST. WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE	PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN LED CONFIDENTIAL HANCLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON , FILE A RECLEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF
RECORDS AND REPORTING. REFER TO RULE 25-22.	
(4) I THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHE	D MEMORANEUM)
	(SIGNATURE AND TITLE OF RESPONDENT)

DISTRIBUTION:
White: Utility Complete and Return to Auditor
Pink: Audit File Copy
Canary: Utility Retain

Biran, I believe it would be best if we discussed the items on these requests with your SME as soon as possible so that we can get the information we need the first time around. It would save us all time and energy. Please set up a conference call. My schedule of availability is:

Monday, August 16- available all day

Tuesday, August 17 - 2:30 p.m. to 5:00 p.m.

Wednesday, August 18 - all day

I will be out of the office on Friday, August 13, but if you leave me a message on my voice mail I will get it. 305, 470-5603.

REQUEST 2 - Re: IXC Flow Through Work Sheets

- A. Provide the IXC Flow-Through Work Sheet for the July 1, 1998 reduction.
- B. Set up a conference call with the subject matter expert to answer to following questions. For those items that would be easier to explain by looking at the documentation, please send the documentation first.
 - 1. Provide documentation of how you came up with the Study Period #Intrastate Est. Minutes (MOUS) for both July 1, and Oct 1 on the IXC Flow-Through Work Sheets. Proivde methodology of estimates and calculation. Provide actual minutes of use for April 98 and May 99 in the same detail you provided the estimate.
- 2. For the column marked IXC Rate Change on both the July and October IXC Flow-Through Work sheets, provide an explanation of how you came up with the % rate change for each element. If the percent rate change is based on the percent increase from the prior tariff to the current, provide all prior and current tariffs for the July and October reductions. The information you supplied is not complete as to the tariffs for each of the rate elements. If you used other methodology, provide explanantion and documentation for each rate element.
- 3. For the column marked Estimate # Intastate (Revenue) for both the July and October Work Sheets, provide how you came up with the dollar amount of revenue for each rate element. Provide actual dollars for April 98 and May 99 for each of the rate elements on the July and October work sheets.

CONFIDENTIA

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REQUEST3		
Did the company increase any rate elements a	fter July 98 and or after October 98. If so pro	vide the name of
the elements, the old rates and the new rates.		
REQUEST 4 Request 1, part of item 3 asked for total revenuand May 99) Please explain where this is in the	ues and minutes of use for the months of Apri	198 I home
and May 99) Please explain where this is in the	e information you provided. If not in the inforn	nation, please
provide. april 99 (47)		
REQUEST 5		
C	VI	

Request 1, Item 3 asked for aces to your billing ystem in April 98 and M ay 99. Please be prepared to discuss this and how we can select a sample from you billing system. Provide a sample of a bill for each rate element on the July and October Flow Thru Work Sheets.

REQUEST 6

CONFUENTAL

10-3 -P2



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

October 1, 1999



Scott Wagers
FPSC
Division of Auditing
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dear Scott

Pursuant to Ruth Young's request this disk is being sent for processing. Please treat as proprietary and confidential.

Sincerely,

Brian Sulmonetti

CONFIDENTIAL



DATE:

November 01, 1999

TO:

Ruth Young, Florida PSC

FROM:

Michael Green

SUBJECT:

Florida PSÇ Audit

CC:

Brian Sulmonetti

Here is a new copy of the fourth quarter, 1997, Florida traffic. It is in a text format (tab delimited), so you should be able to open it in Lotus. GTE's OCN is 0328 and United's OCNs are 0340 and 0341. The originating traffic can be identified with a "D" or an "O" in the SRV column. The terminating traffic will have a "T" in the SRV column. Let me know if you have any questions or problems.

MCI WORLDCOM

Reyb

Michael Green Pricing Analyst Wholesale Pricing 6929 North Lakewood Avenue Mail Drop 5.2-101 Tulsa, OK 74117 918 590 5984 Fax 918 590 0764 michael.green@wcom.com

CONFIDENTIAL

10-3 P.45

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

REQUEST NUMBER: Follow up to Reg 7 to D. DATE OF REQUEST: 9/1/ AUDIT PURPOSE:	
REQUEST NUMBER: Follow up to Reg 7 Item D. DATE OF REQUEST: 9/9/	UEST)
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REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 9/14/91	
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN UNITSIDE OF AN	
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Please explain the following:

A. According to the October 1 flow thru work sheet, WTI World One Switched rates increased and WTI World One Dedicated rates increased 2%. Attached are the tariffs provided effective July 1 and October 1 for this service. There doesn't appear to be a change in rates. Please explain. (See Attached A1 and A2).

B. According to the information provided for the Oct 1 rate increase for Home Advantage Easy plan, the rate went from .139 to .128. Provide the tariff with the .139 or the tariff with the .135 as noted on the information provided to us. See Attached B.

C. Please show calculations on how you came up with the 13.0% rate reduction for Biztel Bus 17 from the 4th revised tariff of .17 cents to the 5th revised tariff of .103 cents. No attachment.

D. The Classics Carrier Service rate change according to the Flow Through Work Sheet is the calculation used to come up with the number (attachment D1) shows the current rates to be .1021 for switched and .0602 for dedicated. The prior tariff July 1, 1998 (Attachment D2) shows different rates.

CONFIDENCE OF DOORS

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PAUL 00 2002

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

TO: Brian Julmonette	•
UTILITY: World Com Park	The state of the s
(AUDIT MANAGEK)	(AUDITOR PREPARING RELUEST)
REQUEST NUMBER: 10 1 AUDIT PURPOSE; 2xC +1	DATE OF REQUEST: 9/1/19
REQUEST THE FOLLOWING ITEM(S) BE	PROVIDED BY: 9/14/86
REFERENCE RULE 25-22,006, F.A.C.,	(DAIE)
	OUTSIDE OF AN INQUIRY
ITEM DESCRIPTION:	
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TO: AUDIT HANAGER	DATE: 9/15
THE REDNESTED RECORD OR DOCUMENTATION: (1) AS BEEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE	BIT LITE BE MADE AVAILABLE BY
	(E) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN MIDNED CONFIDENTIAL HANDLING OF THIS HATERIAL, THE UTILITY OR OTHER PERSON
SSS. 183. 385.083, OR 367.195, F.S. TO MAINTAIN OF MAINTAIN CONFERENCE AND TO STATE THE AUDIT DOT CONFERENCE AND THE CONFERENCE	ntinled confidential handling of this material, the utility or other person BNC, file a healest for confedential classification with the division of •22.006. F.A.C.
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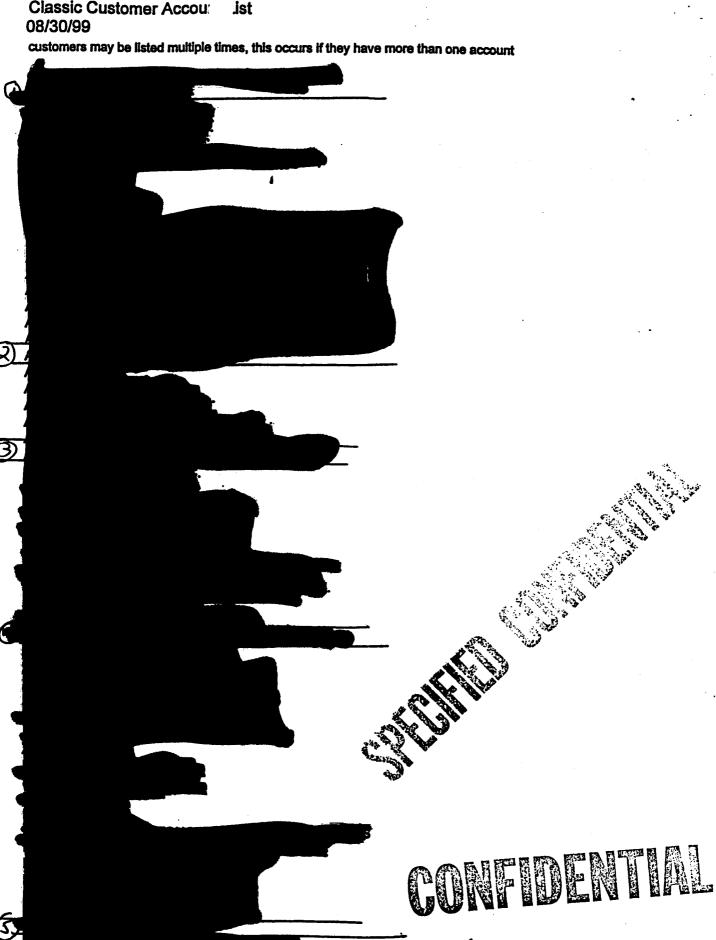
On the IXC Flow-Through Work Sheet for October 1, 1998, the WNS Transcend element was reduced Provide documentation for this reduction, i.e., prior and new contracts for resellers that make up the

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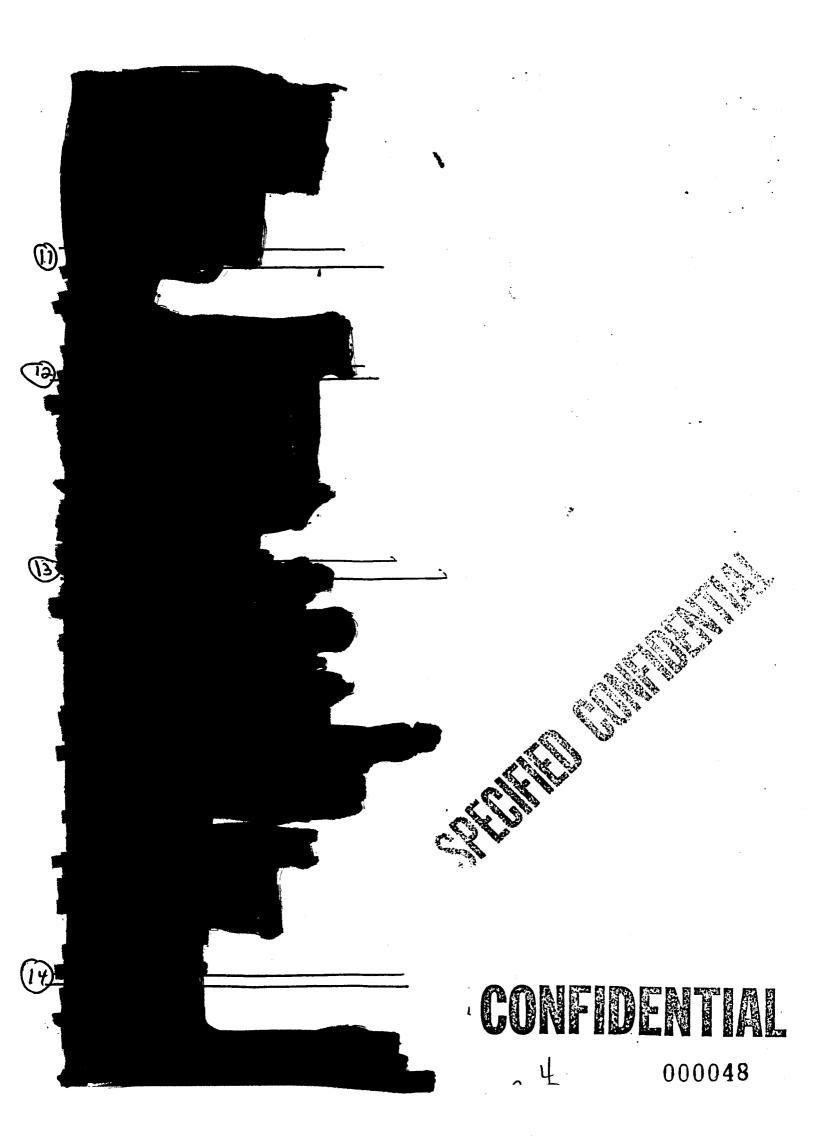
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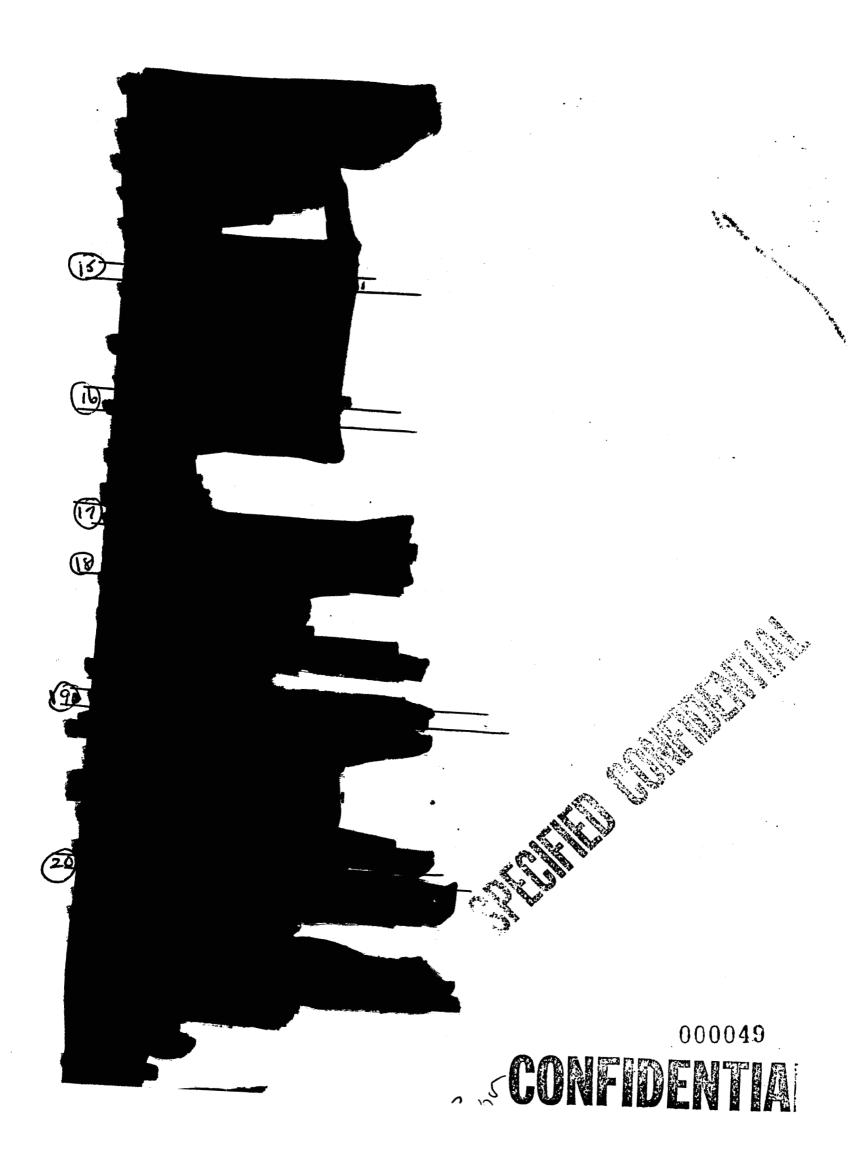
TO: Brian Insmitte	•
UTILITY: Worldow	•
FROM: (MOLE) MANAGERS ()	(AUDITUR PREPARING REQUEST)
REQUEST NUMBER: AUDIT PURPOSE:	DATE OF REQUEST: 10//99
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AND IN MY OPINION, ITEM(S) 354.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL MIST. WITHIN 21 DAYS AFTER THE ALOTT EXIT CONFERENCE, FILE A RECUEST RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.	CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF
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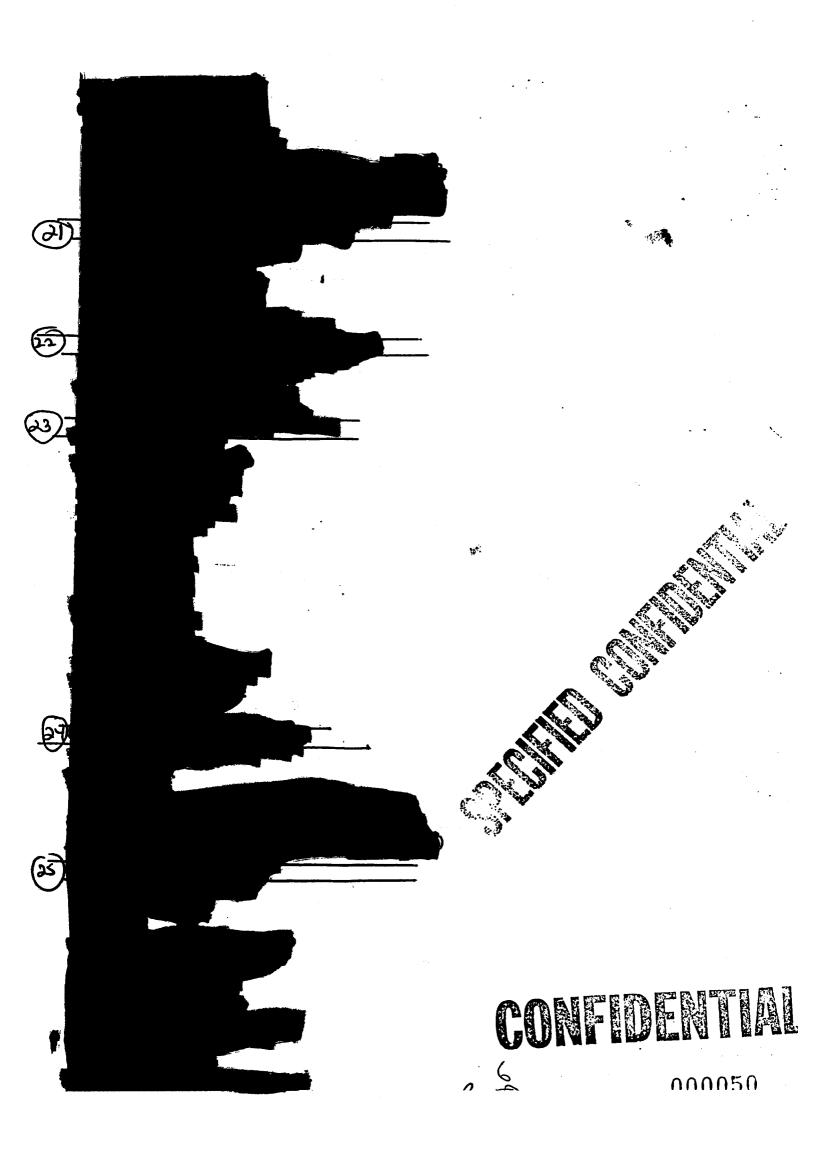
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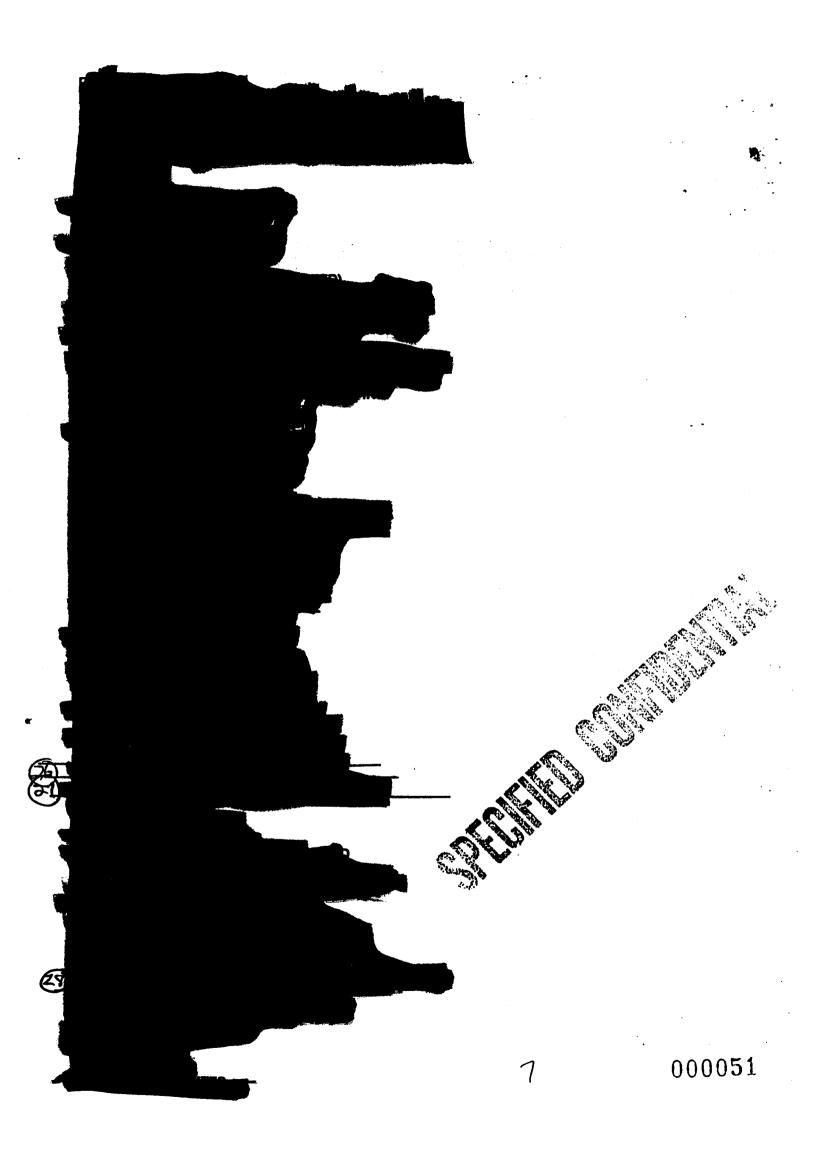


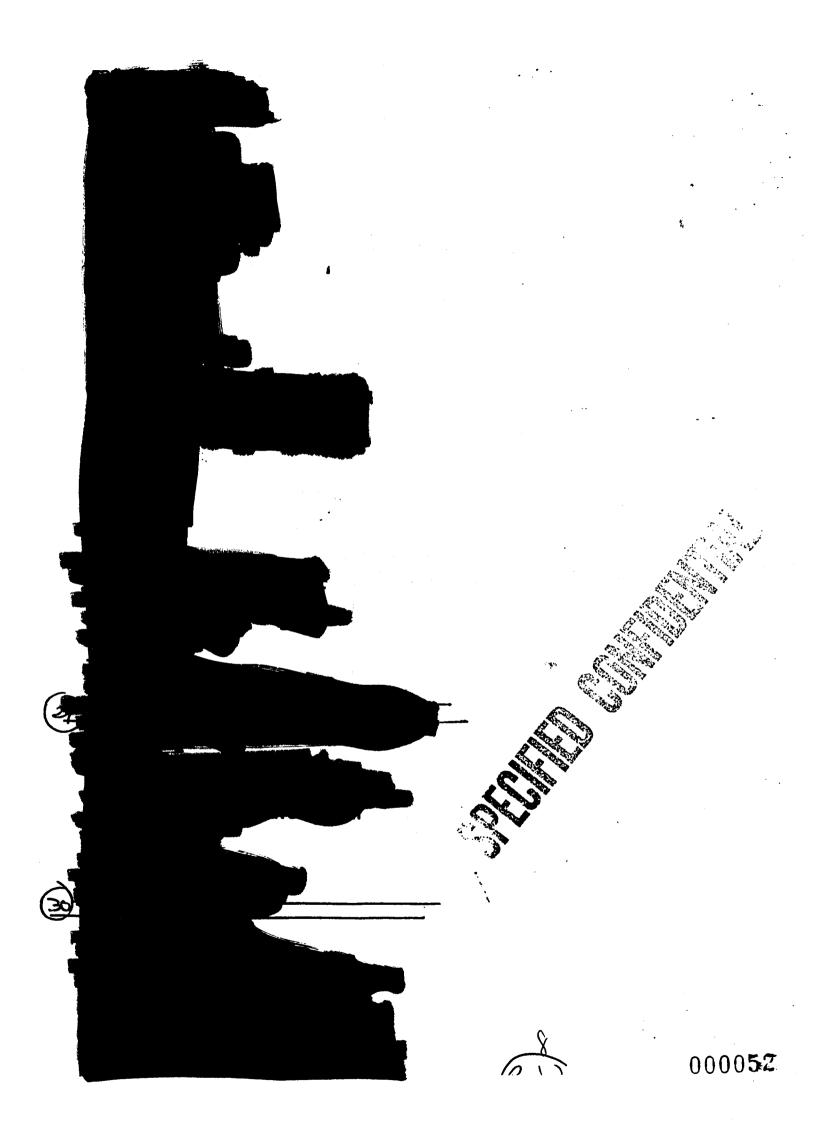


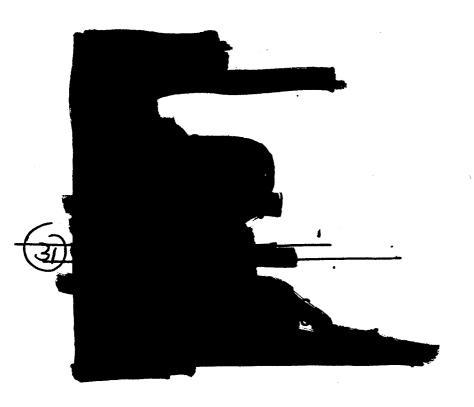












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FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST

R- H	GE OF INTENT
TO: Worldcon	
FROM: CARDY FRANCERY	(ADDITOR PREPARING REQUEST)
REQUEST NUMBER: JU U U AUDIT PURPOSE: TXC CUTTO	DATE OF REQUEST: 11/17/99
REQUEST THE FOLLOWING ITEM(S) BE	PROVIDED BY: 1/24/99
REFERENCE RULE 25-22.006, F.A.C.	. THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
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(2) CANNOT BE PROVIDED BY THE REQUESTED DAT	
(3) AND IN MY OPINION. ITEM(S) 364.168, 365.088. OR 367.196, F.S. TO PRINTAIN (MUST. MITHIN 21 DAYS AFTER THE ALDIT EXIT CONFE RECORDS AND REPORTING. REFER TO RULE 2	ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON RENCE, FILE A RELUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF 5-22.006. F.A.C.
(4) THE ITEM WILL NOT BE PROVIDED, (SEE AT	TACHED (HEMORAHOUM)
•	(SIGNATURE AND TITLE OF RESPONDENT)
DISTRIBUTION:	
White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain	000054
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•	PSG/AFA-6 (Rev. 2/95)
	CANFIDENTIAL

MCI WORLDCOM REG AFFAIRS FPSC MIAMI

PAGE 05 007

REQUEST 12 - FOLLOW UP TO 10

The information provided in enswer to request no. 10 received on November 12, 1999 is not sufficent to document the monthly amount reduced for the WNS Transcent rate element on the October 1, 1999 IXC Flow Through Work Sheet.

We need the actual calculations of how you came up with the monthly amount in the October 1, 1999 work sheet by customer. We also need to see all the WNS Transcend rate element customers bills for the month before the reduction and the month of the reduction to recording to the Commission's rules on confidential information.

As I will be on vacation until December 5, please let Kathy Welch know by November 24, at 305,470-5602, when this information will be available. If you cannot supply this information, please explain why in writing to Kathy Welch by November 24.

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

TO: The Nans	
UTILITY: Walkon //	
FROM: (AUDIT MAPPER)	(MOOTION PROPARTIES/REJUEST)
REQUEST NUMBER: 13	DATE OF REQUEST: 1/28/00
AUDIT PURPOSE: Tac Oscin Cla	y tellester
REQUEST THE FOLLOWING ITEM(S) BE PRO	IVIDED BY: 3/3/00
REFERENCE RULE 25-22.006. F.A.C TH	IS REQUEST IS MADE: LI INCIDENT TO AN INQUIRY
TOTAL DESCRIPTIONS	COUTSIDE OF AN INQUIRY
TOLING OF RESULT 10	IBA YIZ
Hesse provide The h	formation
respected on the attack	1 letter
Al Transal + Class	zi Carrer
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TO: MEDIT MINAGER _ FOTTL YOUNG	DATE: 3 (360)
THE REPRESED MECORD OR DOCUMENTATION:	
(1) El AMS REEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT	WILL BE MADE AVAILABLE BY
(3) AND IN MY CETHERN, ITEM(S) IS AND	PROPRIETARY AND CONFIDENTIAL BUSINESS INFONMATION AS DEFINED IN
MIST, WITHIN 21 DAS AFTER THE AUDIT DOT CONFERENCE	LED CONFIDENTIAL HANDLING OF THIS MATERIAL. THE LITELITY OR OTHER PERSON. FILE A REDUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COOK. FA.C.
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(4) II THE ITEM WILL NOT BE PROVIDED. (SEE ATTACK	Atti La
	(SIGNATURE AND 1) TILE OF RESPONDENT)
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DISTRIBUTION: White: Utility Complete and Return to Auditor	V
Pink: Audit File Copy Canary: Utility Retain	. 1201
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Commissioner: IOE GARCÍA, CRABBMAN SIMAN P. CLADE J. TERRY DEASON E. LEON JACOBS, IR.



3635 NW \$2±6 AVENUE SUITE 600 MGAMI, PLOPEDA 33164-7602

Public Service Commission

January 28, 2000

VIA FACSIMILE

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

Re: WorldCom Access Charge Flow Through Audit

Dear Ms. Davis:

In order to complete our sudit, we need to follow-up on prior document requests 10, 10A and 12. This will be document request 13.

Classic Carrier Sample

As you know, we could not determine a rate per minuts from the invoices that were sent to us as part of the sample. We discussed this and you sent us detail for Account for the months of August 1998 and July 1999. We need to know how to translate this data into a rate per minute in order to agree to the July 1, 1998, and October 1, 1998, tariff. The tariff shows that this service is apparated into four changes. They are Switched Service Peak, Switched Service Off-Peak, Dedicated Access Peak and Dedicated Access Off-Peak.

We also received detail for Account to the sample and it doesn't appear on the Classic Carrier list of customers. Please explain why this was sent.

WNS Transcend

November 1998 as requested. These are invoices for the months of September and invoices and and and are review of the invoices, there does not appear to be enough that to determine the rate per minute to the customer. If there is a method, please let me know. If not, we need detail so that we can determine what rate per minute the customer was billed to compare with

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



Ms. Julie Davis Page two January 28, 2000

the rate schedule sent to us on disk for the months of September and November 98. Also, please send us the tariffs filed with the Commission for Transcend for the tariff prior to July 1, the July 1 and October 1, 1998 reductions, and the tariff subsequent to October 1, 1998.

You mentioned you would be out of the office next week on Monday through Wednesday. As we need to complete this sudit by February 8, we need this information by February 3 the letest.

Yours truly,

Righ K. Young

Professional Accounting Specialist

cz: Brisn Sulmonetti, MCI WorldCom Danise Vandiver, FPSC

Kathy Welch, FPSC

COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

NOTES FROM CONFERENCE CALL ON AUGUST 17

AUDITOR:

RKY

WP NO

44

CONFERENCE CALL WITH BRIAN SALMONETTI

AUGUST 17, 1999

Heather Gullic - Wholesale Division

Michael Green

Chris Pace- Business World Commercial Market

Katrina Thomas

FOR FLOW THROUGH REDUCTIONS ON OCTOBER 1, 1998

The items to audit on the flow through worksheet on WP 45 are:

A.

- 1. Rate Change for access charges
- 2. Study period # Instratate Est. Minutes (MOUS)
- 3. Savings to Worldcom from the reduced access charges (1 times 2)

B.

- 4. Estimates # Intrastate Revenue
- 5. IXC Rate Change
- 6. Estimates Reduction to customers of Worldcom.

(4 times 5).

A.

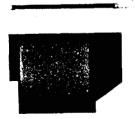
- 1. Rate Change for access charges. The rate change used by Worldcom agrees with the letter provided by the PSC detailing the rate changes.
- 2. Study period # Intrastate Est Minutes (MOUS)

As explained by the company the method for coming up with the MOU to apply to rate change to was to determine the actual minutes of use for Jan, Feb. March 98 for originating calls and termin ating calls. This was determined from the copany CaBS Switched Access Cost reports which is generated monthly and shows the minutes and cost by state. See WP No. 47-1

(a) In order to determine the amount of minutes to apply to the separate LECs (General and United), the company calcualted its total network minutes for the 4th Q 97, identified the network traffic by LECs, and determined the total traffic per LEC. After identifying the total traffic per LEC, the company then identifed the percent of originating minutes and terminating minutes. The results of this is on WP NO. 47pgs 1 and 2...

3. The percents in (2) above were applied to the total originating and terminating minutes of





each LEC to calculate the savings to WorldCom.

Findings to date: '11/1/99.

Study Period Intrastate Minutes -

STATEMENT OF FACTS:

The first section of the flow through worksheet is the "Calculation of dollar Savings and Percent Reduction" to Worldcom for reduced access charges. Staff recalculation shows a difference in the amount of savings. WP 45.

OPINION:

The attached schedule prepared by staff shows that the company calculation of reduced savings is overestimated by the company calculation. WP 44-2.

B.

4. Documentation of Estimated Intrastate Revenues on WP 45

The company chose to reduce eight rate elements to the consumer. For two of the rate leements the company determined a three month average of intrastate revenues. For the five otherr rate elements the company said they used actual one month intrastate revenues for that element. We were provided with print outs from the company detailing some of these months. Time limits preclude us from auditing these amounts through the computer. One rate element is a contract rate. We are awaiting the contracts to audit this element.

- 5. IXC Rate Change The company predetermined a percent to reduce each of the eight rate elements to make sure the estimated reduction per month agreed with the access charge reduction form the LEC's. They then reduced their tariff in effect at October 1, 1998 to relect the predetermined percent. Staff audited the change in tariffs. See Audit Dsiclosure below.
- 6. Estimated Reduction to Customers of WorldCom.

The company applied the IXC rate change to the estimated intrastate revenues to come up with the monthly estimated reduction. No discrepancies noted in this calculation.

SUBJECT:

IXC RATE CHANGES

STATEMENT OF FACTS: The company chose to reduce eight rate elements to pass on the access charge reduction to their customers. Staff reviewed the tariffs both before and after the rate changes. For two of the elements, Classic Carrier Service and Biz-Tel, the percent rate reduction on the flow through worksheet did not reconcile with the new tariffs.





% Reduction Flow Through Worksheet

% Reduction Staff Calculation

Classic Carrier Biz-Tel





Staff's recalculation of the two rate elements are presented on the attached schedule.

OPINION:

The percent that the company determined to derease the Classic Carrier rate element does not agree with the tariff change, resulting in less of a reduction to the customer. The percent determined to decrease the Biz-Tel rate element also does not agree with the tariff change. This results in a larger reduction to the customer. The effect of these two are calculated on the attached schedules

Delossic Carries is one of the rete elements selected

In audil on WP: 52-3 The results

Showed a pedication of

The other pute element selected for sample
was WTI Ovored One Switch of Since flock

the company Culculated a reduction.

The results of the sample showed a reduction

of 52-1

CONFIDENTIAL

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AUDIT DISCLOSURE

SUBJECT: STUDY PERIOD INTRASTATE MINUTES OF USE ON OCTOBER 1, 1998 FLOW THROUGH WORKSHEET

STATEMENT OF FACTS:

The company calculated the monthly dollar savings to the IXC from the Local Exchange companies (LECs) by applying the rate change from the LECs to a monthly estimated number of Intrastate Minutes of Use (MOU). The results is the monthly reduction to pass through to its customers. The company source documentation for the estimated number of MOUs did not agree with the MOUs on the flow-through work sheet.

Staff recalculating of the flow through work sheet based on company source documentation shows that the company overestimate their monthly savings in the amount of permentation or the state of the sta

However, a staff recalculation of the flow-through work sheet based on "Actual" MOUs provided by the company shows that the company would not have passed through enough of a reduction to the customer. This calculation is on the attached schedule. The use of "Actual" MOUs shows their monthly savings to be underestimated. The effect of this is to pass on less to the customer than the reduction received from the LECs. The net of these two calculations show a shortage of the customer for the year. The calculations are on the attached schedule.

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COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

OCTOBER 1, 1998 FLOW THRU WORKSHEET EXCEPTIONS AND

DISCLOSURES for IXC Rate Change Percents

PERIOD: DATE:

OCTOBER 1, 1998 SEPTEMBER 7, 1999

AUDITOR:

RKY

WP NO.

44-1 pg

The company used predetmined % changes to the IXC rates for flow thru and applied them to estimated revenues to come up with their estimated reduction. In order to determine if the company applied these percent reductions (WP45), staff determined the prior tariff and new tariff as of October 1, 1998 and calculated the percent reduction with the following results:

The predetermined percent reductions were reflected in the tariff of all the rate elements on the October 1, 1998 IXC Flow Thru worksheet except for two elements which are Biztel BUS 17 and Classic Carrier Service.

For the Biztel BUS 17 rate element on WP 45 I page 1, the company predetermined reduction and applied that to an estimated monthly revenue of for a per month. According to the company's tariff, the prior tariff as or May 13, 1998 was 17cents per minute. (WP 46-6). The new tariff issued September 30, 1998 of nts per minute. This is a reduction rather than a eduction.

Tariff May 13, 1998 Tariff Sept 30, 1999 0.17 cents 0.10 cents

Reduction divide by

0.07 cents

0.17 cents

Tariff Change

39.41%

The difference in the reduction is as follows:

Flow Through

Staff Calculated

IXC Rate

IXC Rate Change

Rate Element

Change

Per Tariff

Difference

Biztel Bus17

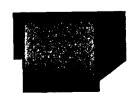
Co Estimated Monthly Intrastate Revenue

Reduction

Rev * % Change

OPINION: According to the tariff change, the company is reducing more revenue than necessary in this rate element.

CONFIDENTIAL



COMPANY: WORLDCOM TECHNOLOGIES TITLE: OCTOBER 1, 1998 FLOW THRU WORKSHEET EXCEPTIONS AND **DISCLOSURES** PERIOD: **OCTOBER 1, 1998** DATE: SEPTEMBER 7, 1999 **AUDITOR: RKY** WP NO. 44-1 p 2 For the Classic Carrier Service reduction of e reduction was calculated useing the prior rate that is not in the tariff. When using the prior rate that is in the tariff the reduction is: Documentation sent by the company (WP 45-4, page 5) **Switched Dedicated** Prior **Proposed** Divideby Reduction % According to the prior tariff **Switched Dedicated** Prior WP 46-4 Proposed Divide by Reduciton % When applied to the estimated monthly revenue used by the company, the monthly reduciton is rather than a difference of er month of IXC Flow Thru Work Sheet **WP 45** Estimated monthly revenue for Classic Carrier Service Percent determined Amount used on Flow thru work sheet Difference undetermined Staff % determined

CONFDENTA

Weighted

Weighted <u>Avg</u>.

or the year.

Annual reduction short	
as part of the tel of customer sills, we what the poter traditions are what	000064
40	NIFAL
43	
42	
43	

COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

OCTOBER 1, 1998 FLOW THRU WORKSHEET ESCEPTIONS AND

DISCLSORES FOR THE STUDY PERIOD INTRASTATE MINUTES

OF USE.

PERIOD: DATE:

OCTOBER 1, 1998

AUDITOR:

SEPTEMBER 7, 1999 **RKY**

WP NO.

44-2

In order to determine the actual monthly savings to be experienced by Worldcom as required on the IXC Flow Thru WorkSheet, the company applied to Rate Change from the Local Exchange Company to a "Study Period Intrastate Minutes" for one month.

The methodology the company used to come up with these minutes was to:

1. Determine the total Florida CABS Minutes for 1998 for originating and terminating. (47-1)

(Actual Jan through March 98 plus estimated April through December - Estimates arrived at by determining the differences between Jan through March 97 and Jan through March 98 by month and averaging the three months. The average was then applied to the actual pril 97 through December 97 to determine the estimated.)

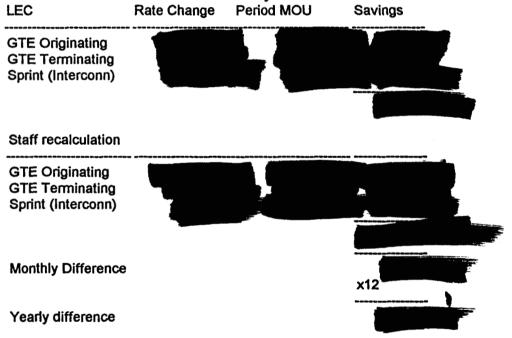
2. Apply the percent of originating and terminating minutes for GTE and for United/Sprint to the total above. (47)

(These percents determined by using the 4th quarter 1997 total minutes of use and determining the % for GTE and Sprint.) 47-1

CONCLUSION:

When staff reclaculated the companys worksheet, a discrepancy was found in the number of minutes for both GTE and United/ Sprint. This discrepancy is on WP no. 47pages 1 &2.

Company Calculation:



Study

000065

The company stated that the person who prepared the minutes of use is no longer with the company and they could not tell us why their minutes



Kulash

COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

OCTOBER 1, 1998 FLOW THRU WORKSHEET ESCEPTIONS AND

DISCLSORES FOR THE STUDY PERIOD INTRASTATE MINUTES

OF USE.

PERIOD: DATE: OCTOBER 1, 1998

AUDITOR:

SEPTEMBER 7, 1999 RKY

WP NO.

44-2

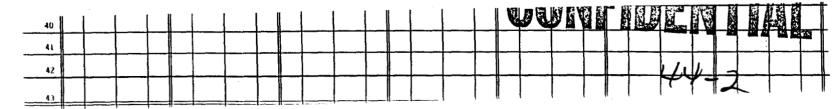
different than the staff calculation. However, it appears from this calculation that the company overestimated their needs to reduce their tariffs.

However, a recalculation of the flowthrough worksheet based on actual Minutes of Use provided by the company shows that the company did not collect the amount of reduction estimated.



The net difference is below:

Staff Calculation based on Company Source Documentation														
LEC	Rate Change	Study Period MOU	Savings											
GTE Originating GTE Terminating Sprint (Interconn)		r a												
Estimated Monthly Reduction														
Staff recalculation	based on compa	iny actual												
GTE Originating GTE Terminating Sprint (Interconn)														
Actual Monthly Re	duction													
Monthly Difference			x12											
Yearly net shortag	е													



IXC Flow-Through Work Sheet

Name(s) of IXC: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI National, Inc.

Study Period (one or more months in 1998):

July Average

Calculation of \$ Savings and Percent Reduction

LEC Rate Change X Minutes (MOUS) = Sw. Acc. Savings

1. GTE Orig. CCL) x = Sw. Acc. Savings

2. (Term. CCL) x = Sw. Acc. Savings

Interconnection) x = Sw. Acc. Savings

4. Total Sw. Acc. Savings (Sum lines 1-3)

5. Statewide intrastate long distance study period billable revenue

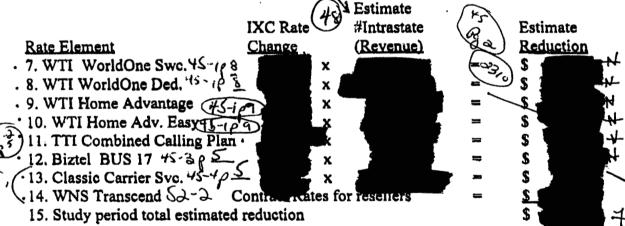
6. Required % reduction in IXC's FL intrastate long distance rates (line 4/line 5) Not Applicable

N.A.

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

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

Monthly Savings Spread Over Specific Rate Elements



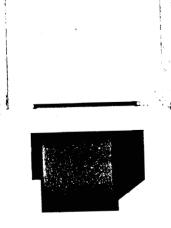
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IXC Summary

IXCs: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI National, Inc.

Effective date of flow-through:

October 1, 1998

Percentage Reduction of IntraLATA toll rates

WorldCom has only one rate schedule, therefore the percent reduction for intraLATA was no greater than interLATA.

Determination of Residence & Business Calculation

WorldCom determined what percentage of our Florida market was attributed to Commercial, Residential, Biztel, and Wholesale sectors. Then the total savings were allocated between each sector based on this percentage and then flowed through in the products listed. WorldOne, Biztel BUS 17, TTI's Combined Calling Plan, Classic Carrier Service, and Transcend products are part of the "business rate" summary below. Home Advantage is in the "residential rate" summary below. Please note that the Transcend product is a non-tariffed contract service for resellers.

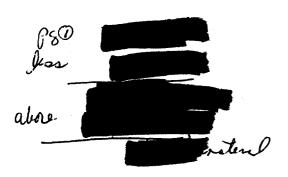
IXC Flow-Through Summary

1. Annualized Effect of Flow-Through to Residential Rates

2. Annualized Effect* of Flow-Through to Business Rates:

3. Total Annualized Flow-Through (line 1+ line 2)

ITI is classified as Business in the IXC Flow Through Summary, but has some residential traffic.





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COMPANY:

TITLE:

PERIOD:

WORLDCOM TECHNOLOGIES

CHANGES IN TARIFFS

PRIOR TO AND AFTER JULY AND OCTOBER RATE

REDUCTIONS JANUARY 25, 2000

DATE: **AUDITOR: RKY**

WP NO.

88

53-2

J3-2

WORLD ONE SERVICE

FPSC Tariff No 4 FPSC Tariff No 4 FPSC Tariff No 4 FPSC Tariff No 4 3RD Revised

4th Revised

5th Revised

6th Revised Sheet 165

7th Revised Sheet 165

Sheet 165

Sheet 165

Sheet 165

INTERLATA	10/1/96	4/10/98	7/1/98	10/1/98	5/18/99
Switched Per Minute	1				
Monthly Outbound	0.1395	0.1562	0.1464	0.1376	0.1477
Monthly Inbound	0.1485	0.1630	0.1559	0.1465	
12 Month ESP Out and In	0.1350	0.1512	0.1418	0.1333	0.1430
24 Month ESP Out and in	0.1305	0.1462	0.1371	0.1289	0.1382
Dedicated Per Minute					
Monthly Outbound	0.0990	0.1139	0.1068	0.1047	0.1048
Monthly Inbound	0.1080	0.1242	0.1164	0.1141	0.1144
12 Month ESP Out and In	0.0945	0.1087	0.1019	0.0999	0.1001
24 Month ESP Out and In	0.0945	0.1035	0.0970	0.0951	0.0953

Source taryps. Island with the common

NFIDENTIAL

COMPANY:

PERIOD:

DATE:

WORLDCOM TECHNOLOGIES

CALCULATION OF ESTIMATED MINUTES OF USE KW 105/08

FOR THE FLOW THRU WORK SKEET

OCTOBER 1, 1998 REDUCTION

AUGUST 18, 1999

RKY

WP NO.(

AUDITOR:

47

Study Period # Intrastate Est Minutes per Wp 45

GTE

ORIG CCL GTE

Sprint

Term cCL Interconnection



According to the company, the caclualtion of these are as follows:

Total Florida CABS Minutes 1998 Actual and Estimated originated WP 47-1

Times Percent of network minutes used by GTE foothe 4th Quarter

1997. WP 47-1)

Divide by 12

Per Flow Thru Work sheet **45**

Diference in minutes of use

Total Florida CABS Minutes 1998 Actual and

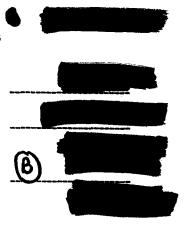
Estimated Terminated 47-1

Times Percent of network minutes used by GTE fog the 4th Quarter

1997. WP 47-1

Divide by 12 Per Flow Thru Work sheet 4501

Diference in MInutes of Use



Die WP 44-2 for recalculation of reduction \$ with perioded Minutes of Use of cliscone

DENTIAL



SPRINT

Total Florida CABS Minutes 1998 Actual and Estimated originated WP 47-1

Times Percent of network minutes used by Sprint for the 4th Quarter 1997. WP 47-4

divide by 12

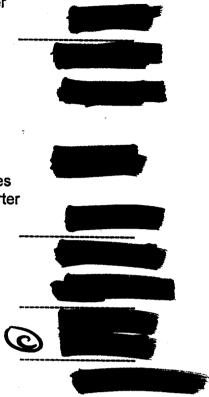
Total Florida CABS Minutes 1998 Actual and Estimated Terminated 47-1

Times Percent of network minutes used by Spring foorthe 4th Quarter 1997. WP 47-4

Divide by 12

Total Originating and Terminating Per Flow Thru Worksheet

Difference



CONFIDENTIAL



NEW CALCULATION BASED ON ACTUAL Study Period # Intrastate Est Minutes per Wp 45

GTE GTE ORIG CCL Term cCL

Sprint

Interconnection



The company provided ACTUAL ANNUAL MOUS. This changes the savings as calculated below.

GTE

Total Florida CABS Minutes 1998 Actual and Estimated originated WP 47-1 22 Times Percent of network minutes

Times Percent of network minutes used by GTE foR the 4th Quarter 1997 WP 47-1

Divide by 12 Per Flow Thru Work sheet

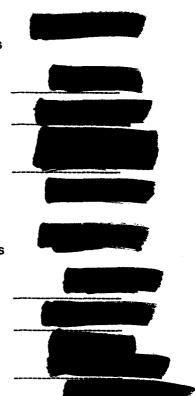
Diference in minutes of use

Total Florida CABS Minutes 1998 Actual and Estimated Terminated 47-1 2 Times Percent of network minutes

Times Percent of network minutes used by GTE for the 4th Quarter 1997. WP 47-1

Divide by 12 Per Flow Thru Work sheet

Diference in Minutes of Use





48 p3

000072



NICHARDON TO THE

SPRINT

Total Florida CABS Minutes 1998 Actual and

Estimated originated WP 47-1/2
Times Percent of network minutes used by Sprint for the 4th Quarter 1997. WP 47-4

divide by 12

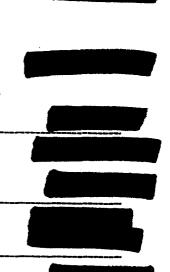
Total Florida CABS Minutes 1998 Actual and Estimated Terminated 47-1/2

Times Percent of network minutes used by Spring foorthe 4th Quarter 1997. WP 47-4

Divide by 12

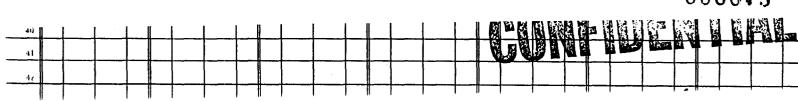
Total Originating and Terminating Per Flow Thru Worksheet

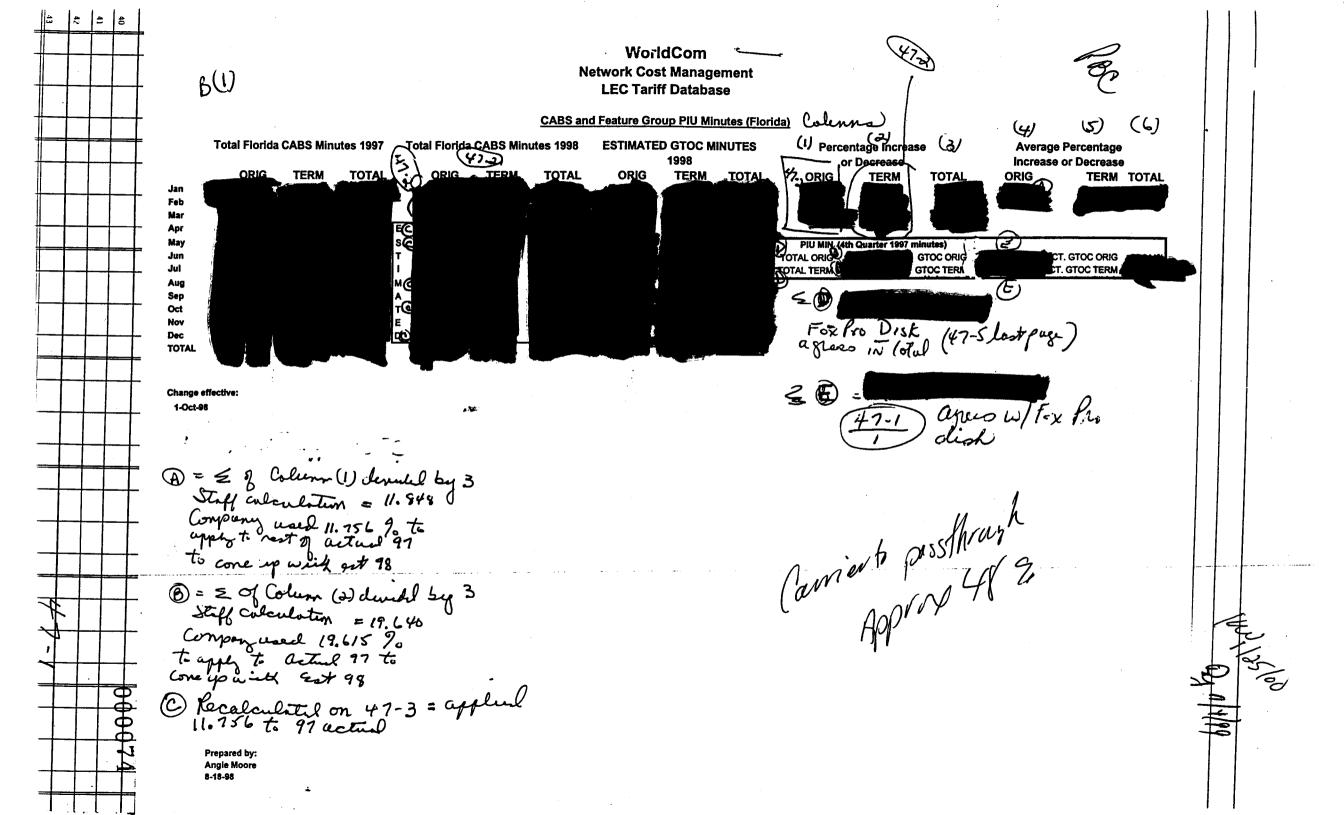
Difference

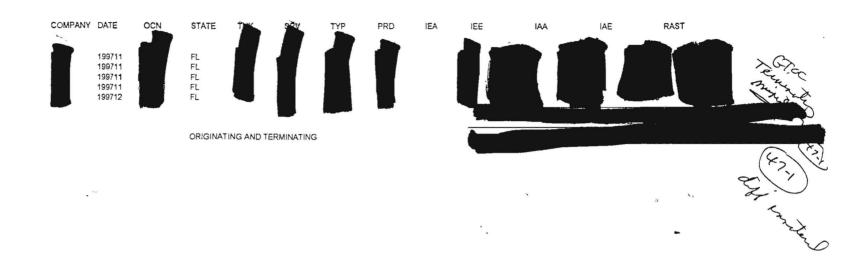


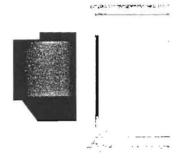
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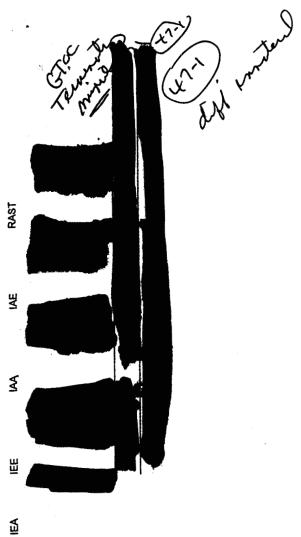


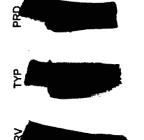






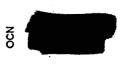
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ORIGINATING AND TERMINATING



199711 199711 199711 199711 COMPANY DATE

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B11/1/99 for Actual Per Co. Mci WorldCom Wholesale Marketing Florida PSC Audit
CABS Minute Estimation Validation Percent Difference Term CABS Orig Estimated 1998 Orig Diff Orig Difference CABS Term Diff Term **Estimated** State Network . Notes: 41p3+4 CONFIDENTIAL 000078 1000078

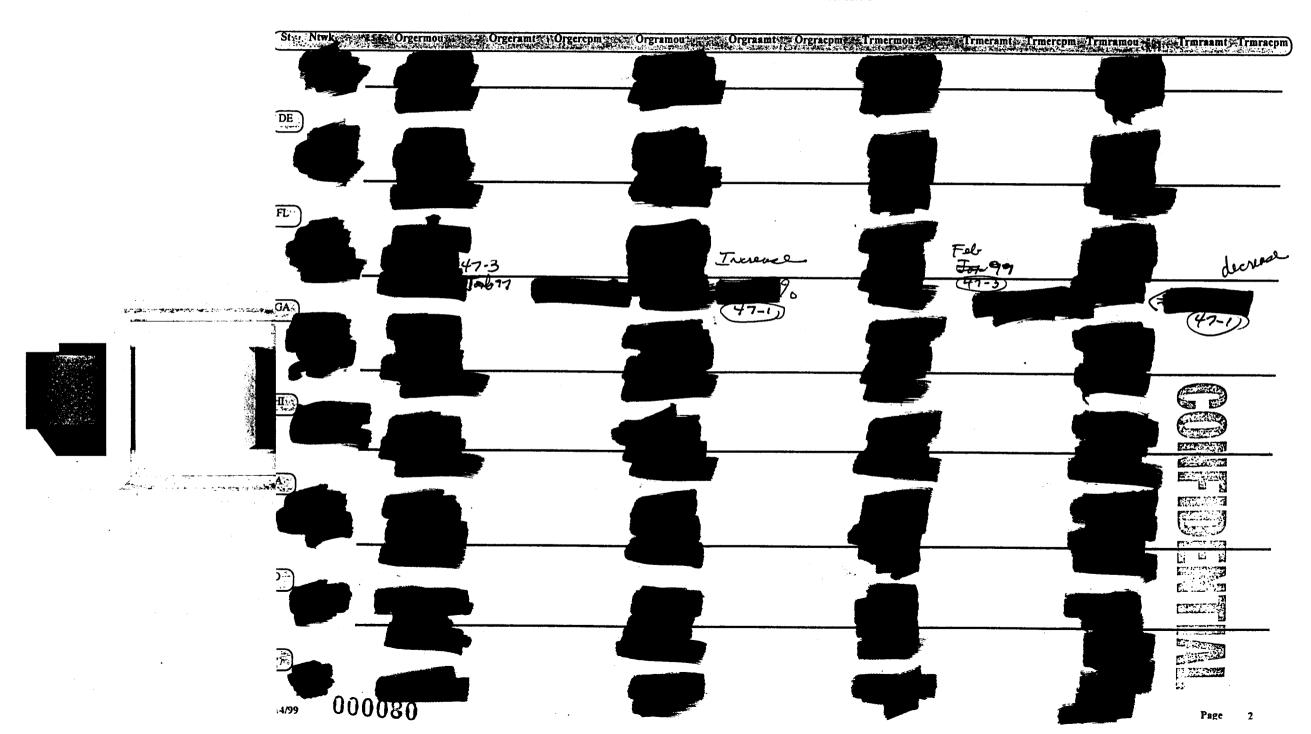
January '98

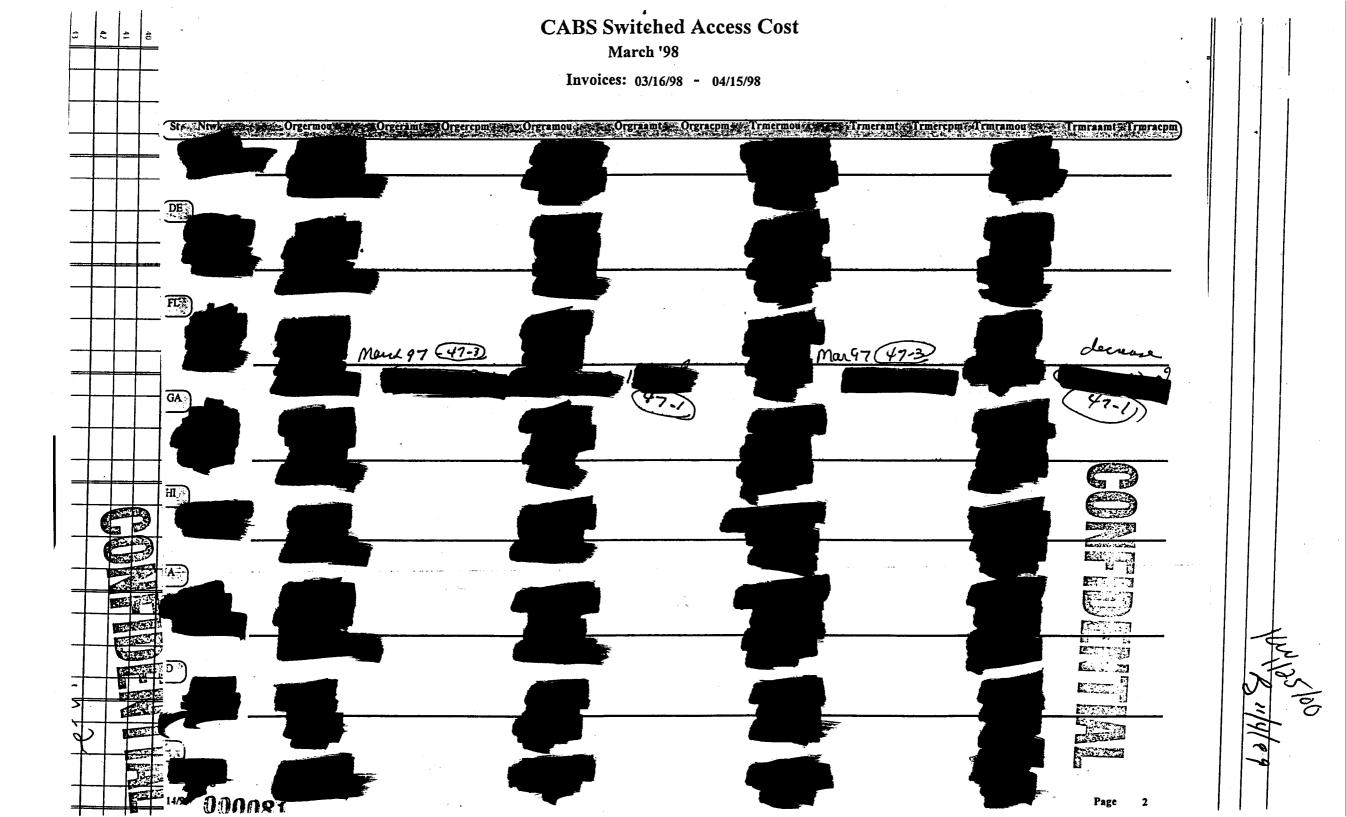
Original Invoices: 01/16/98 - 02/15/98 Tum

Sim Niwking and Organicate Organica Organicate Organicate Organicate Organicate Organicate Organica Organicate Organicate Organicate Organica Organica Organica Organica Organica Organica Organica Organica Organica Organica Org C. 47-3 47-3 INCOM Burgan sempenganan en ses ses en 47.1) i decrese Jan 47 Jun97 (47-J) No. 000079 Page 2 .4/99

February '98

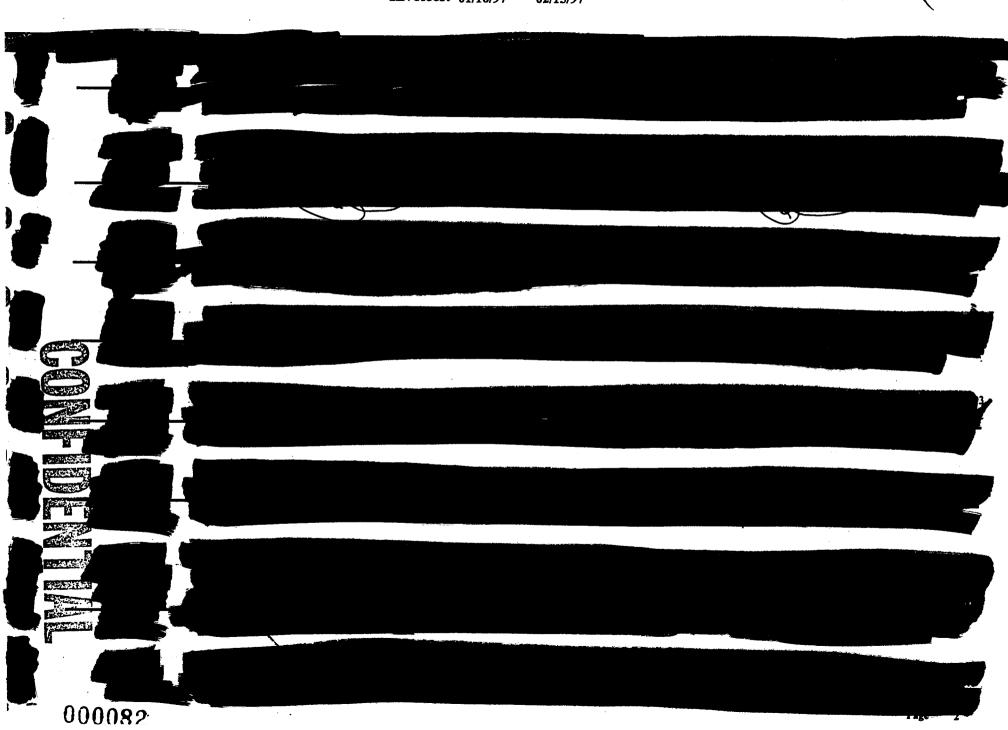
Invoices: 02/16/98 - 03/15/98





CADS SWITCHED Access Cost January '97

Invoices: 01/16/97 - 02/15/97



February '97

Invoices: 02/16/97 - 03/15/97



5/98

000083

Page / 2

March '97

Invoices: 03/16/97 - 04/15/97



CADS SWITCHED ACCESS COST April '97

Invoices: 04/16/97 - 05/15/97



May '97

Invoices: 05/16/97 - 06/15/97



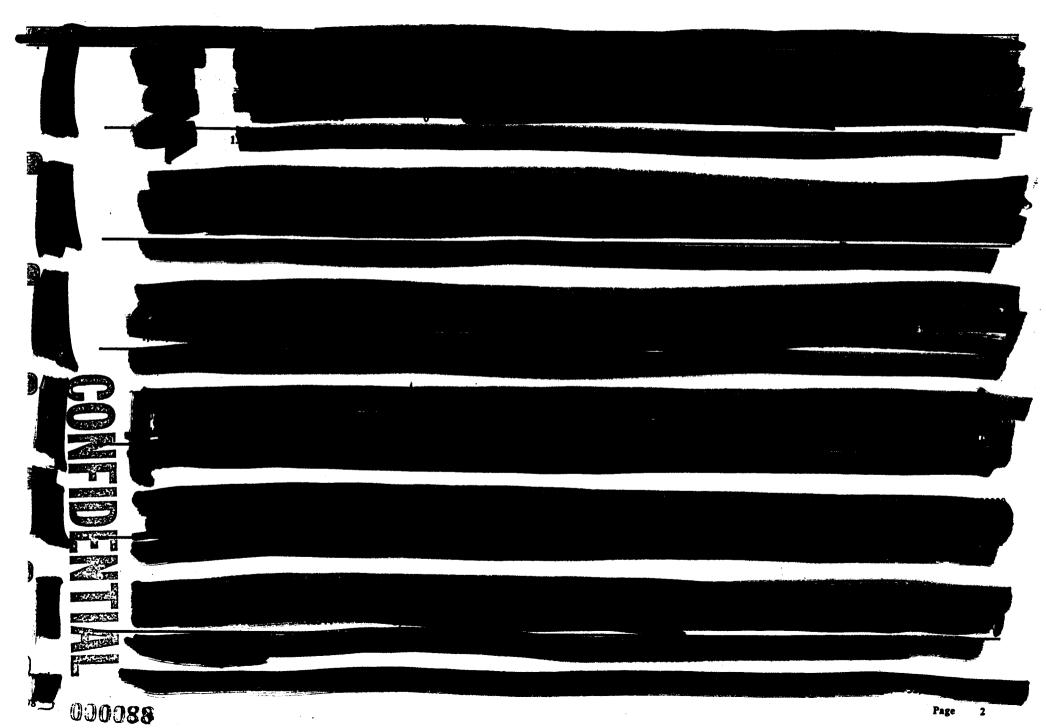
CABS Switched Access Cost June '97

Invoices: 06/16/97 - 07/15/97



July '97

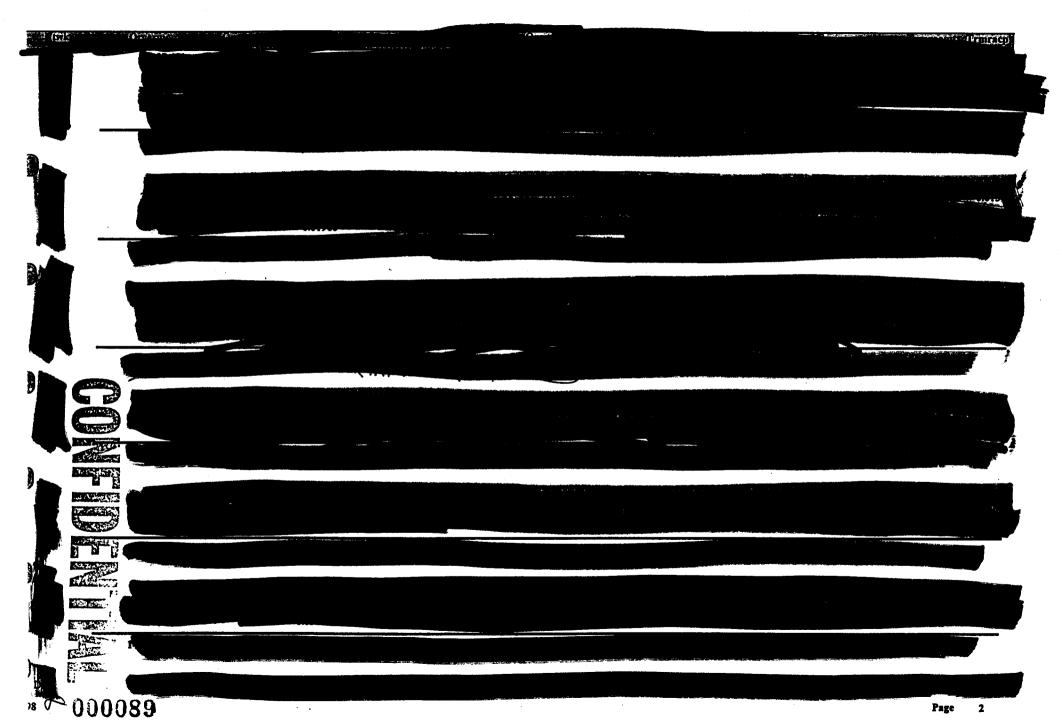
Invoices: 07/16/97 - 08/15/97



CABS Switched Access Cost

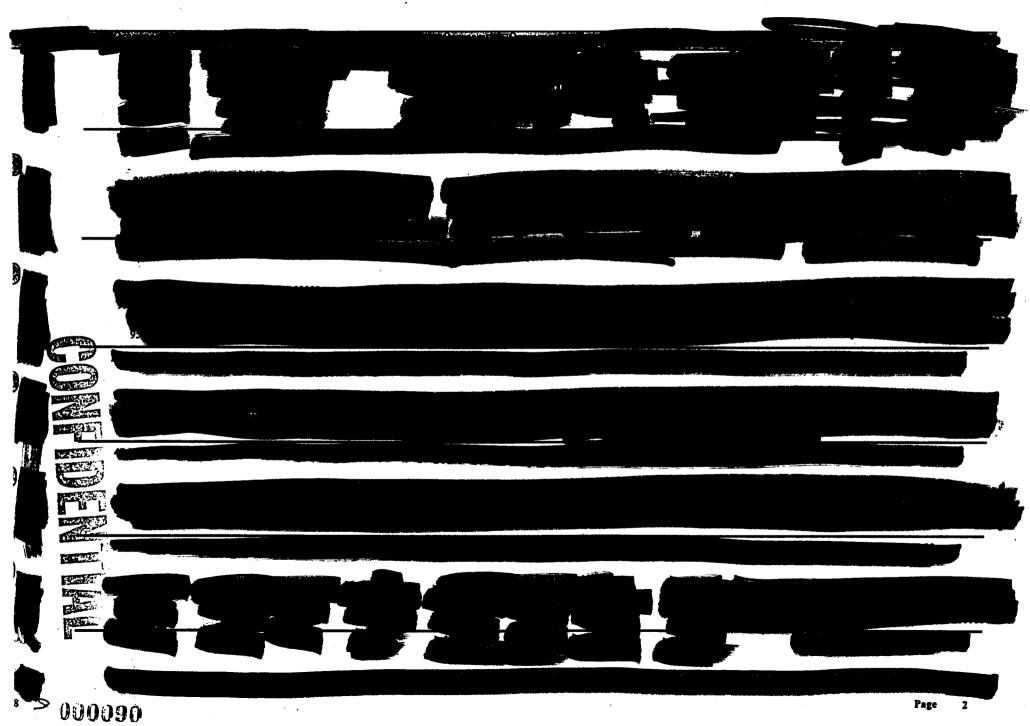
August '97

Invoices: 08/16/97 - 09/15/97



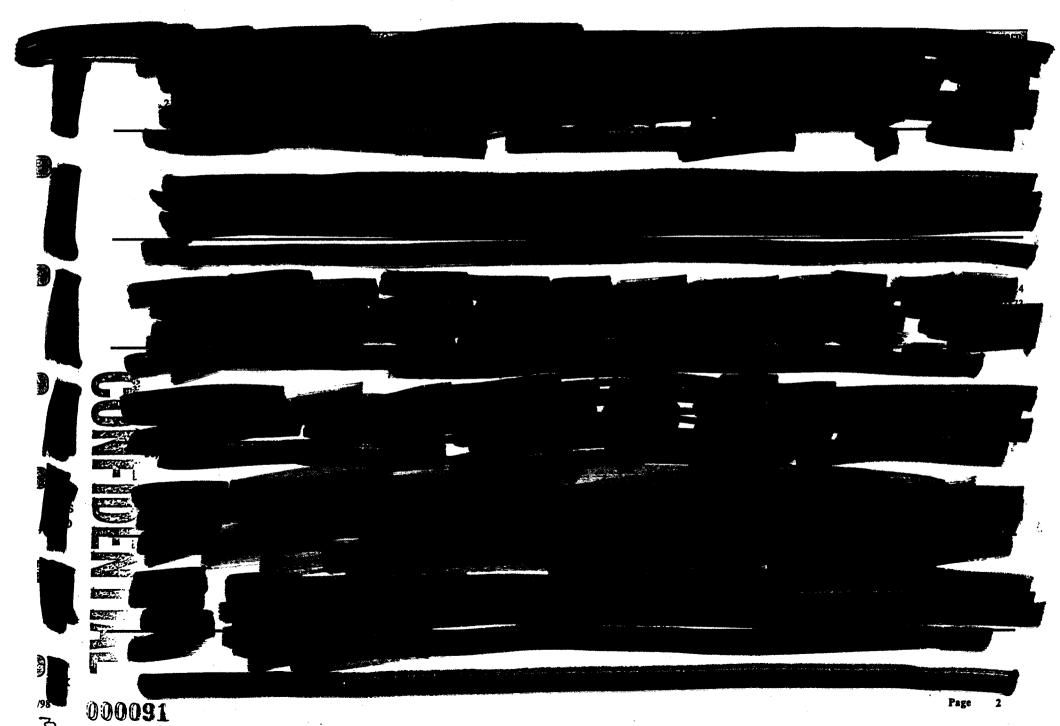
CADS SWITCHEU Access Cost September '97

Invoices: 09/16/97 - 10/15/97



October '97

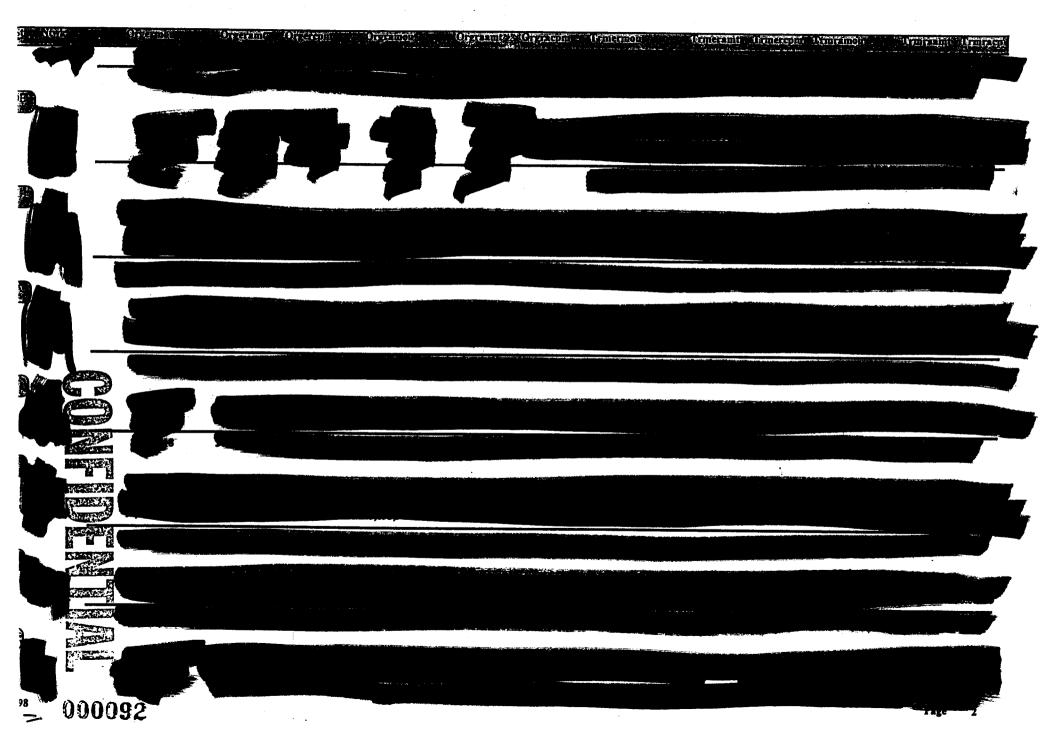
Invoices: 10/16/97 - 11/15/97

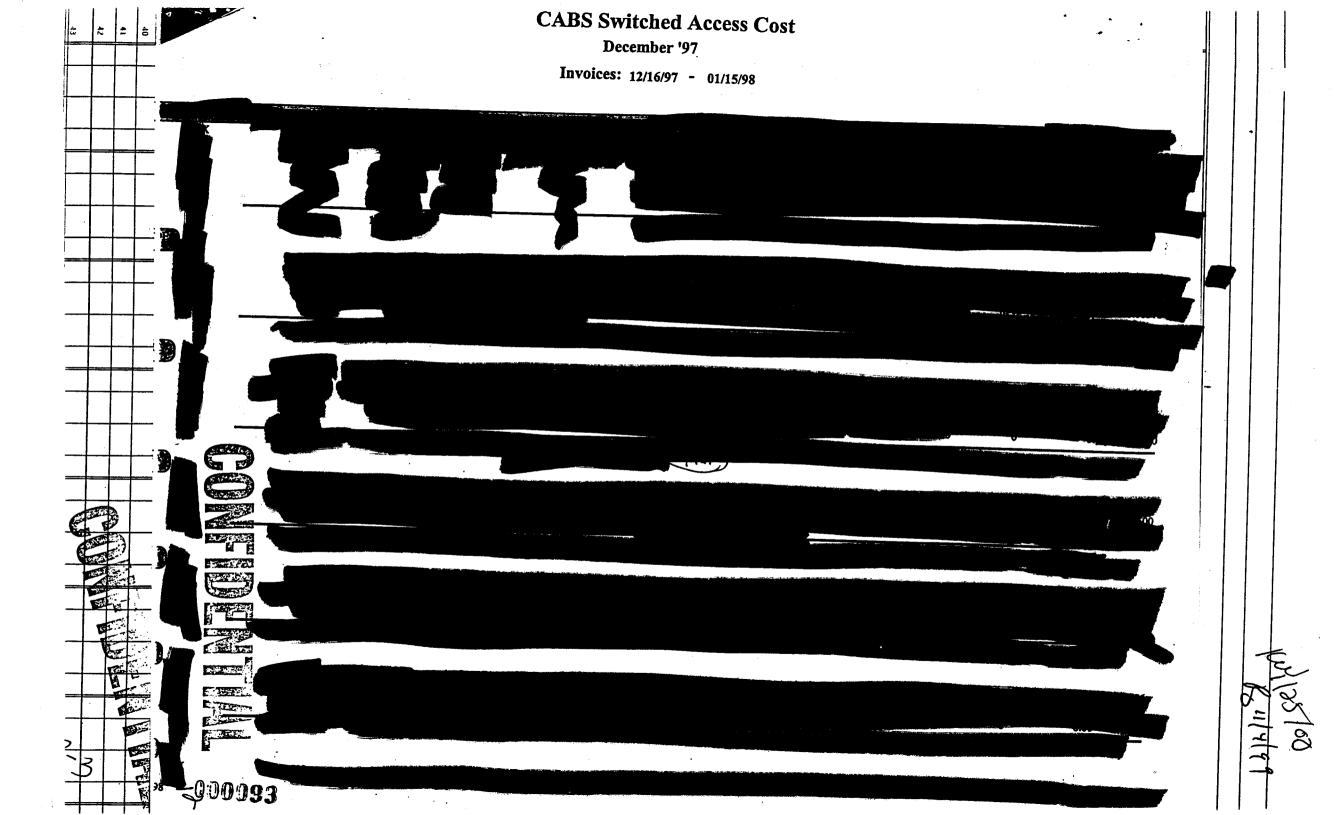


CADS SWITCHER ACCESS COST

November '97

Invoices: 11/16/97 - 12/15/97

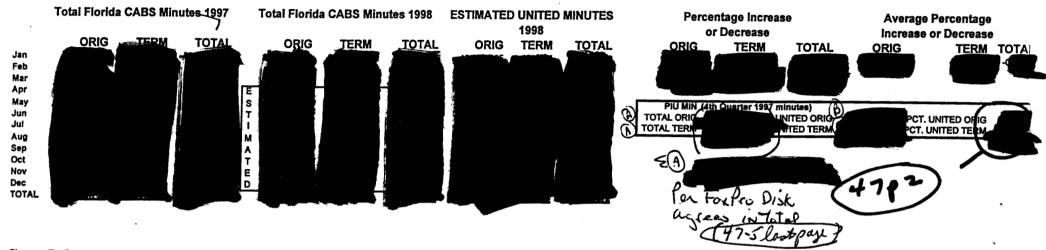




Network Cost Management LEC Tariff Database

850

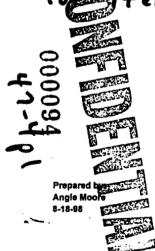
CABS and Feature Group PIU Minutes (Florida)



Change effective: 1-Oct-98

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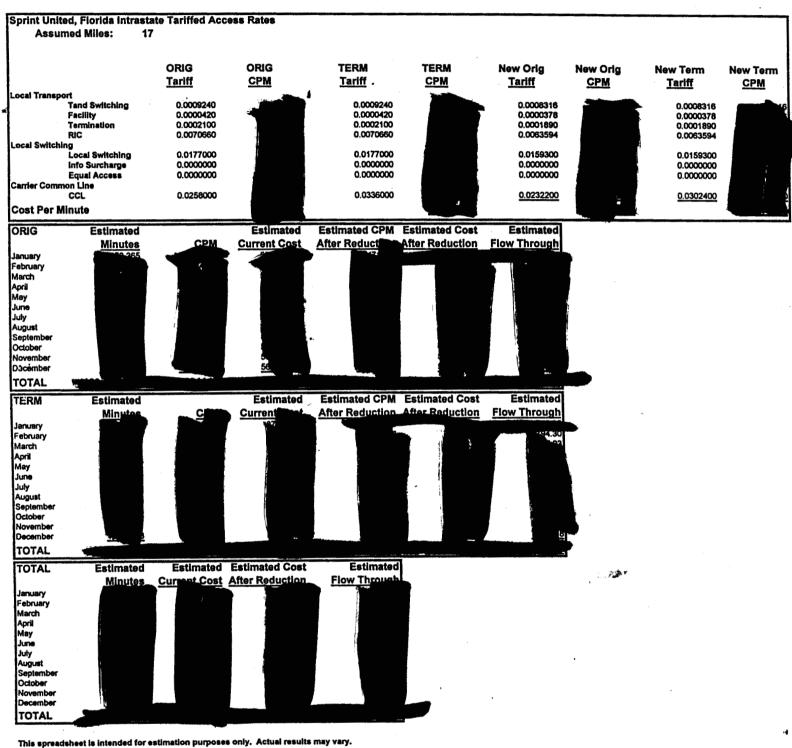
All DATA Except 7. For 4th Q 17 Network minutes, is the Same As 47-1. See that for tems Audited.





WorldCom **Network Cost Management LEC Tariff Database**

Rate Reduction and Flow Through Analysis - Florida (Sprint United)



This spreadsheet is intended for estimation purposes only. Actual results may vary.

All traffic assumed to be:

tandem routed

1+ traffic

premium, Feature Group D rate elements

17 miles

Prepared by: Angle Moore 8-18-98

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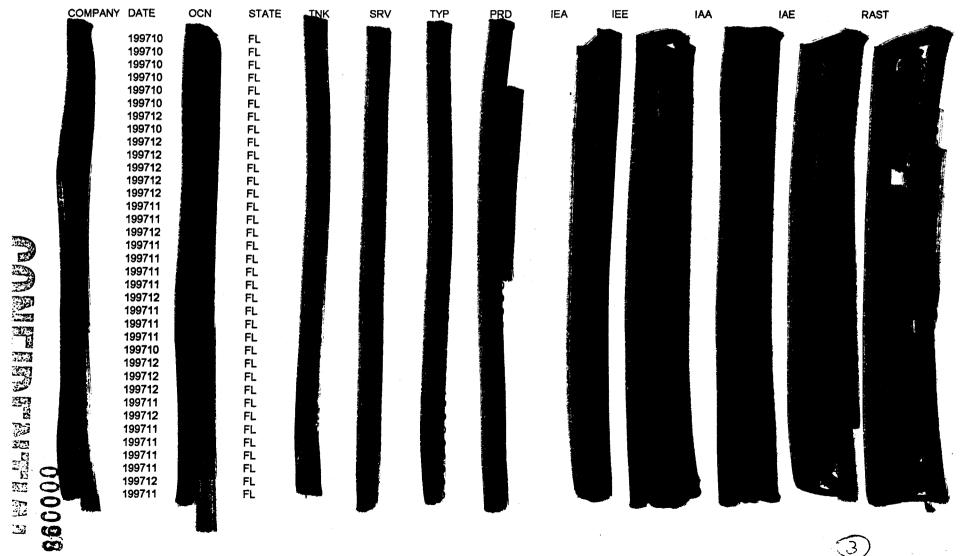
Conpany. Worldcom andie: Ry 10/3/89

STAFF SELECTED EXCERPT FROM COMPANY PROVIDED DISK.

	COMPANY	DATE	OCN	STATE	TNK	SRV	TYP	PRD	IEA	IEE	IAA	IAE	RAST
	COMPANY	DATE	OCN	STATE	TNK	SRV	TYP		IEA	IEE	IAA	IAE	RAST
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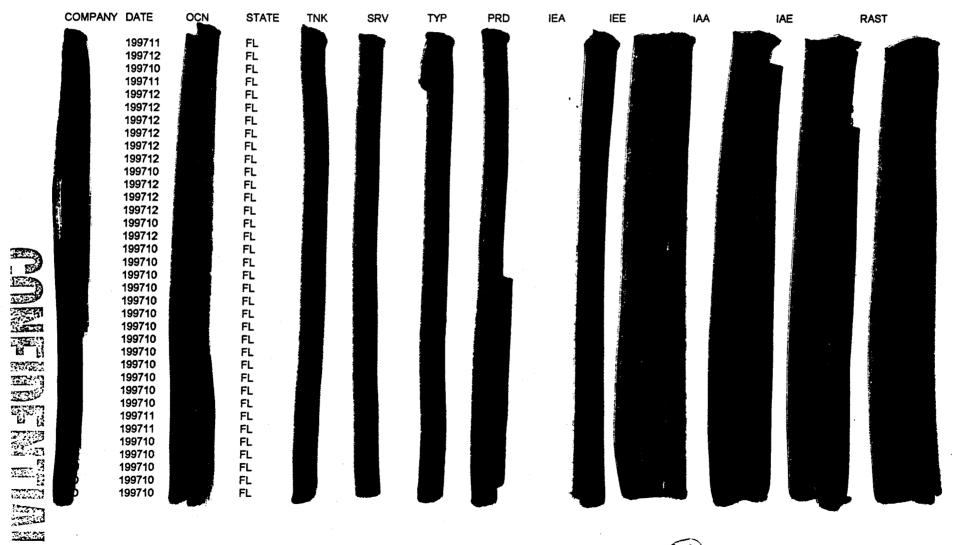
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COMPANY	DATE	OCN	STATE	SRV	TYP	PRD	IEA	IEE	IAA	IAE	RAST
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TOTAL ORIGINATING AND TERMINATING



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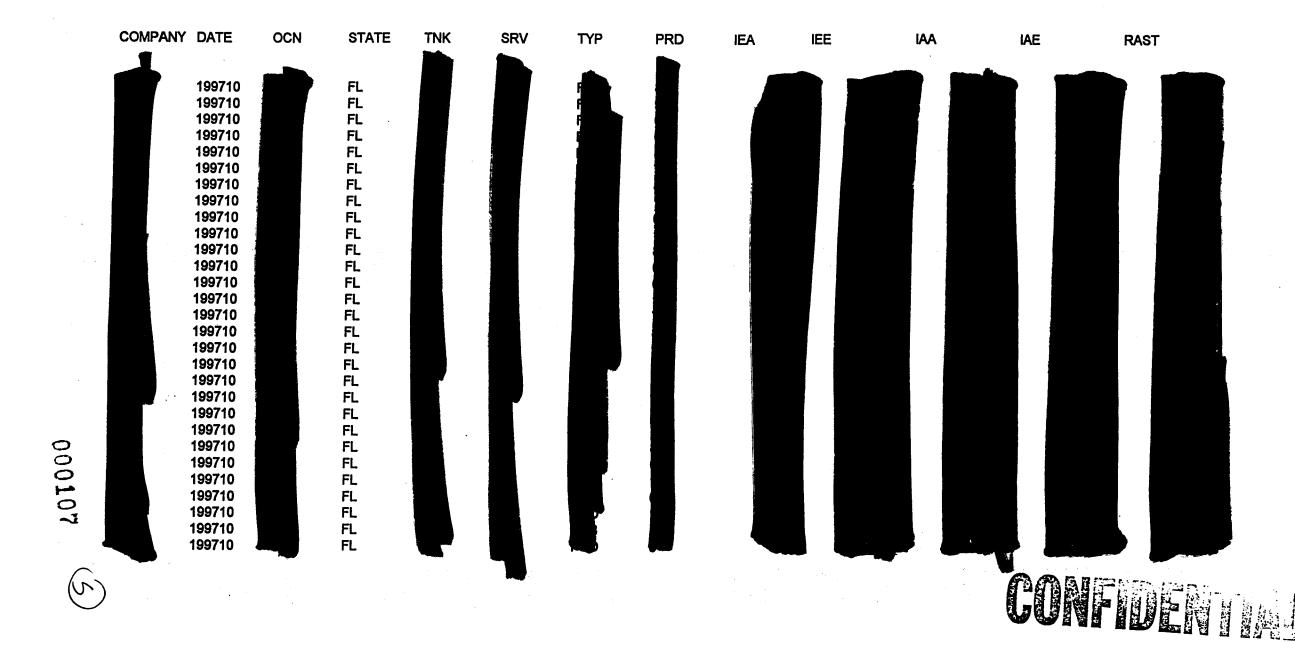
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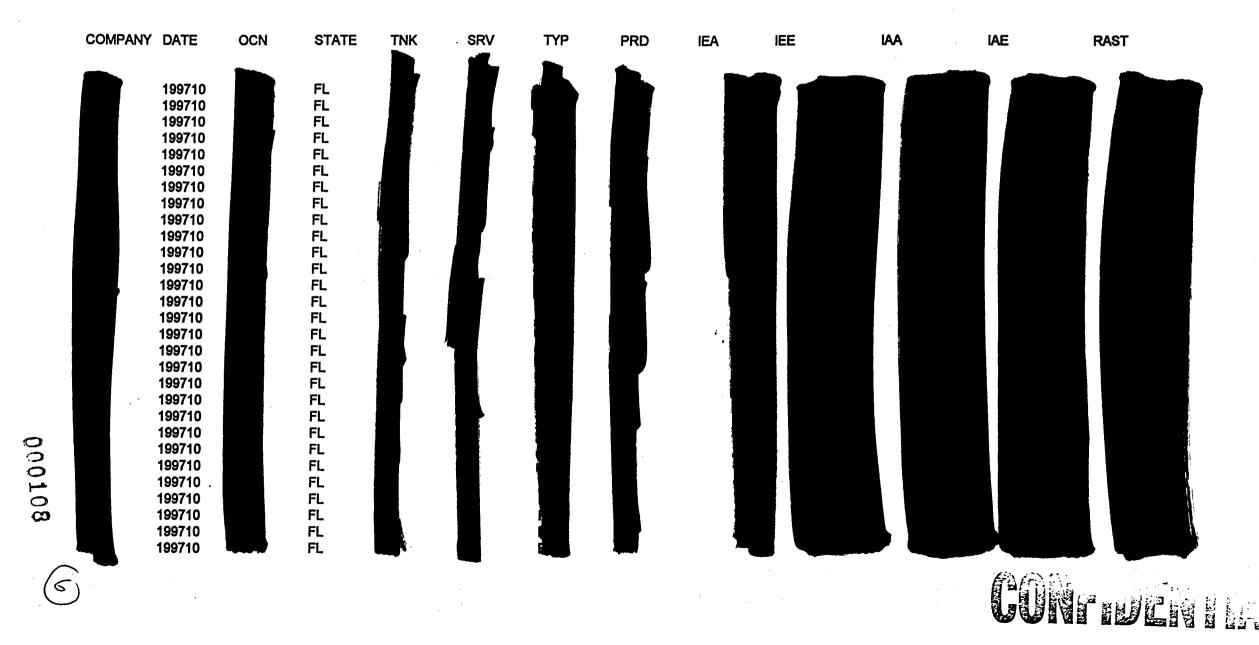


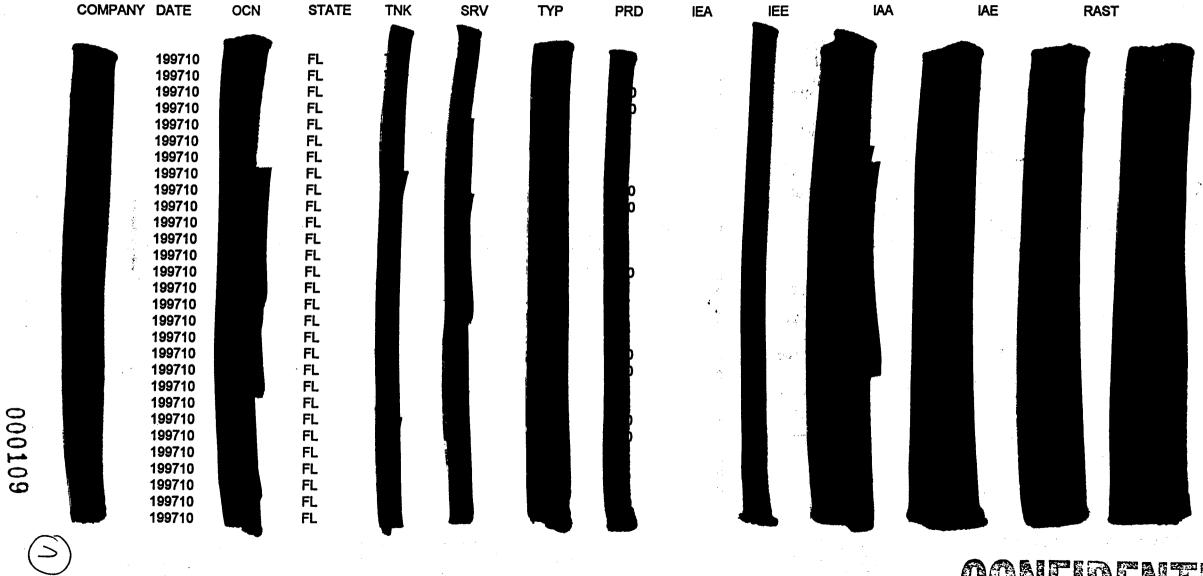
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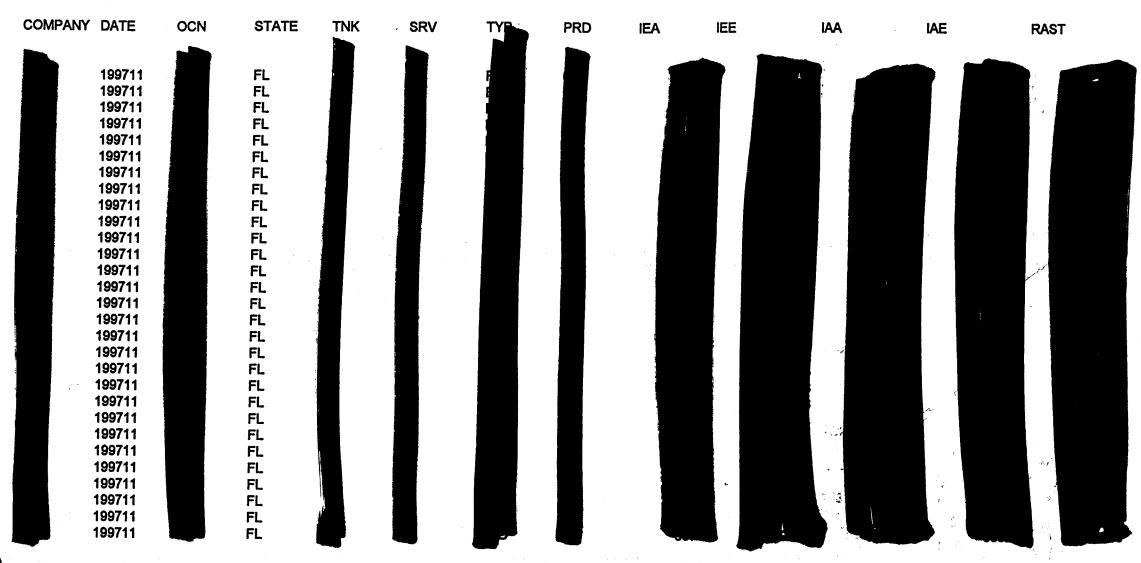
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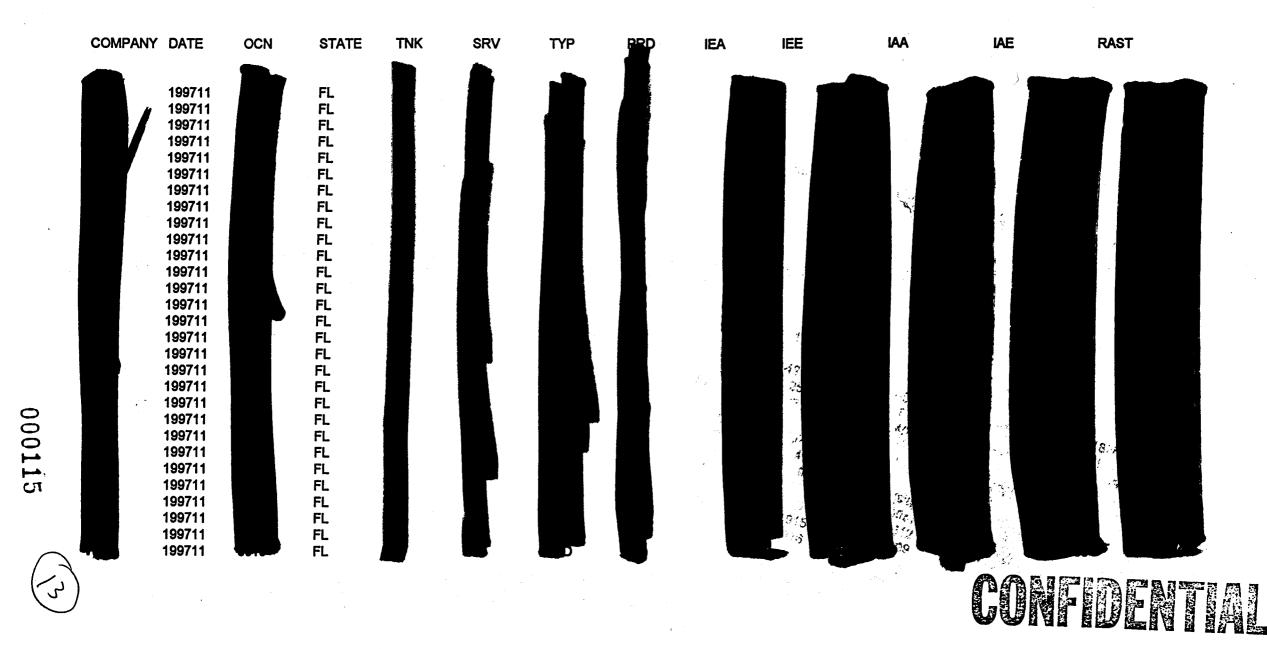
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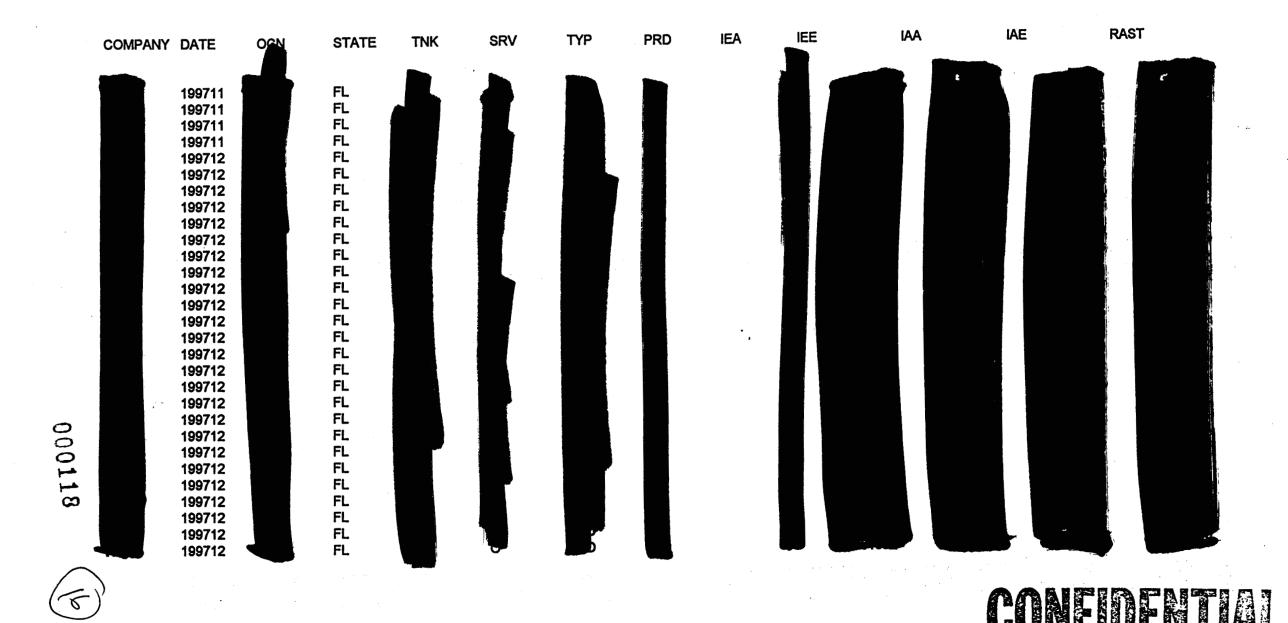


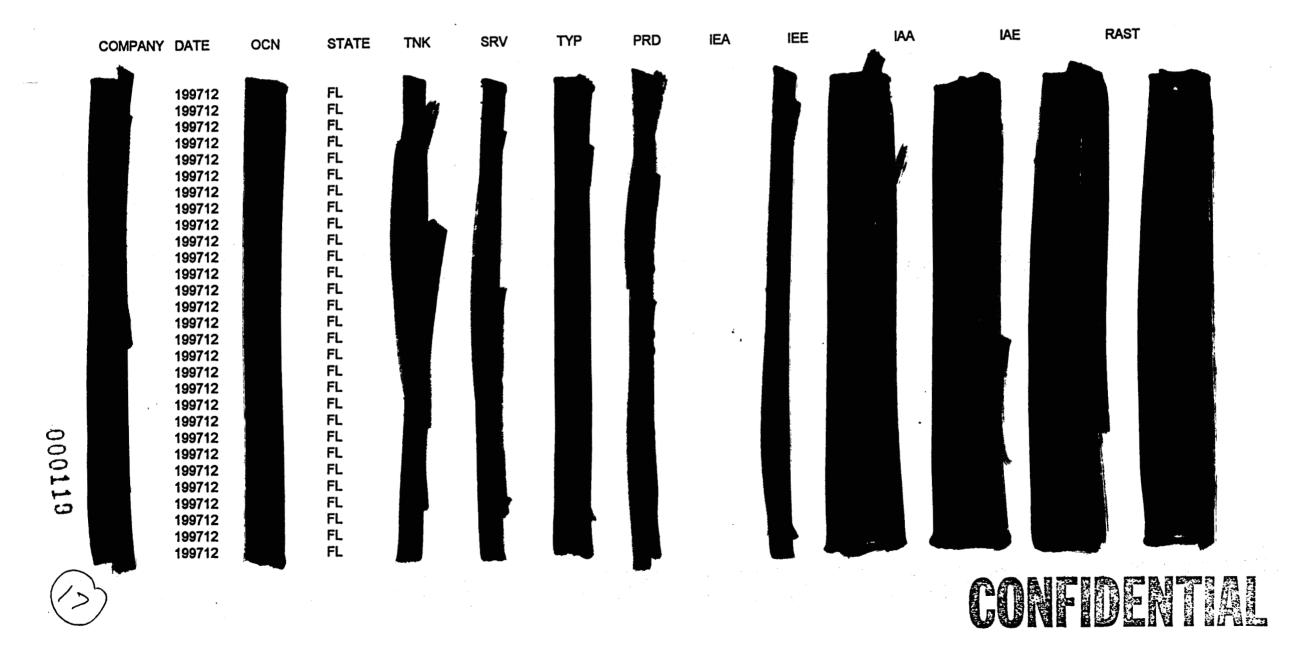


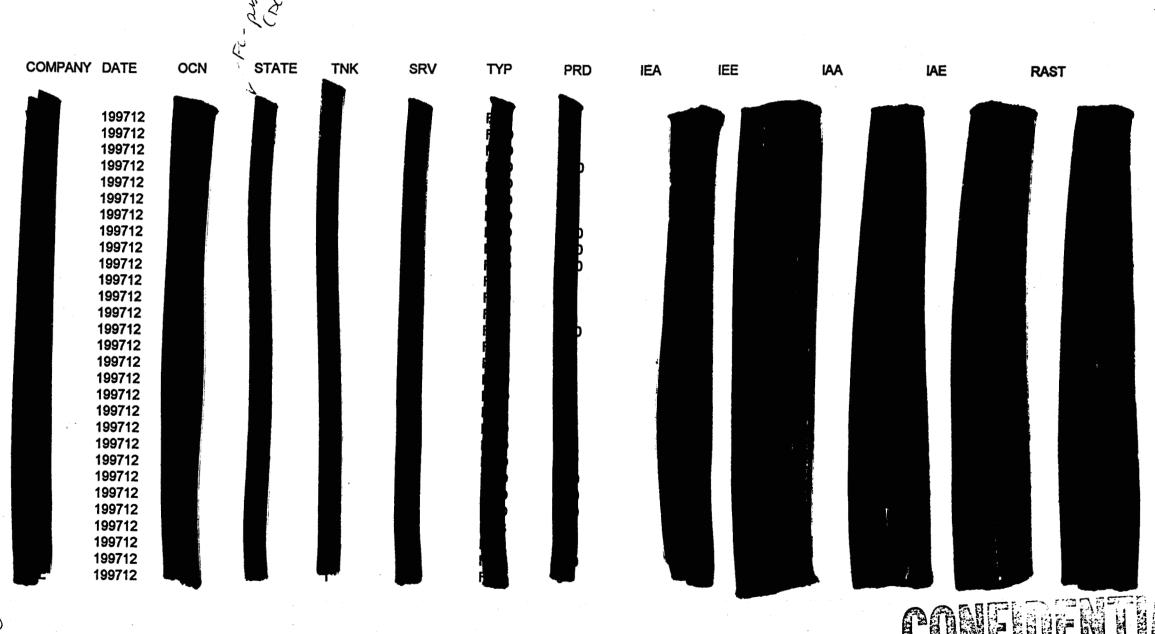












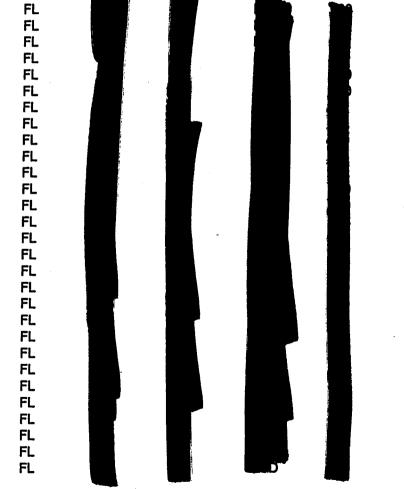


COMPANY DATE

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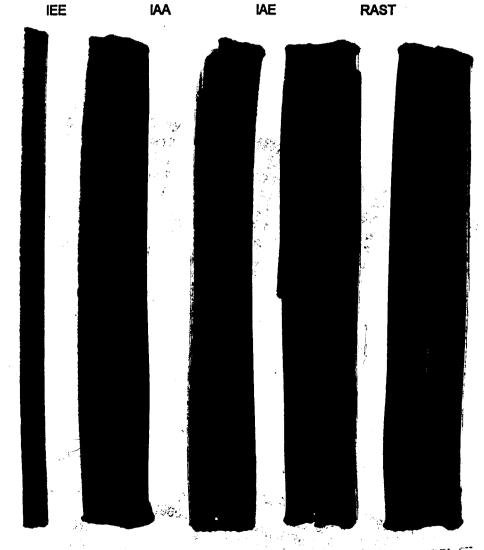


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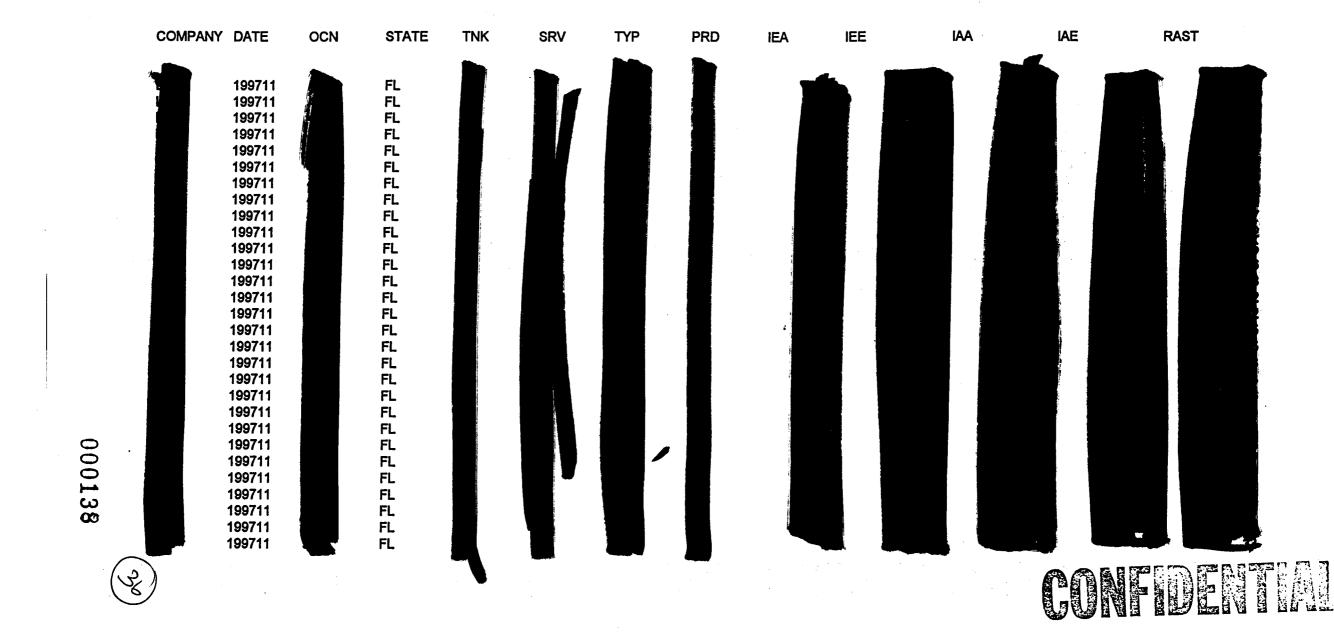
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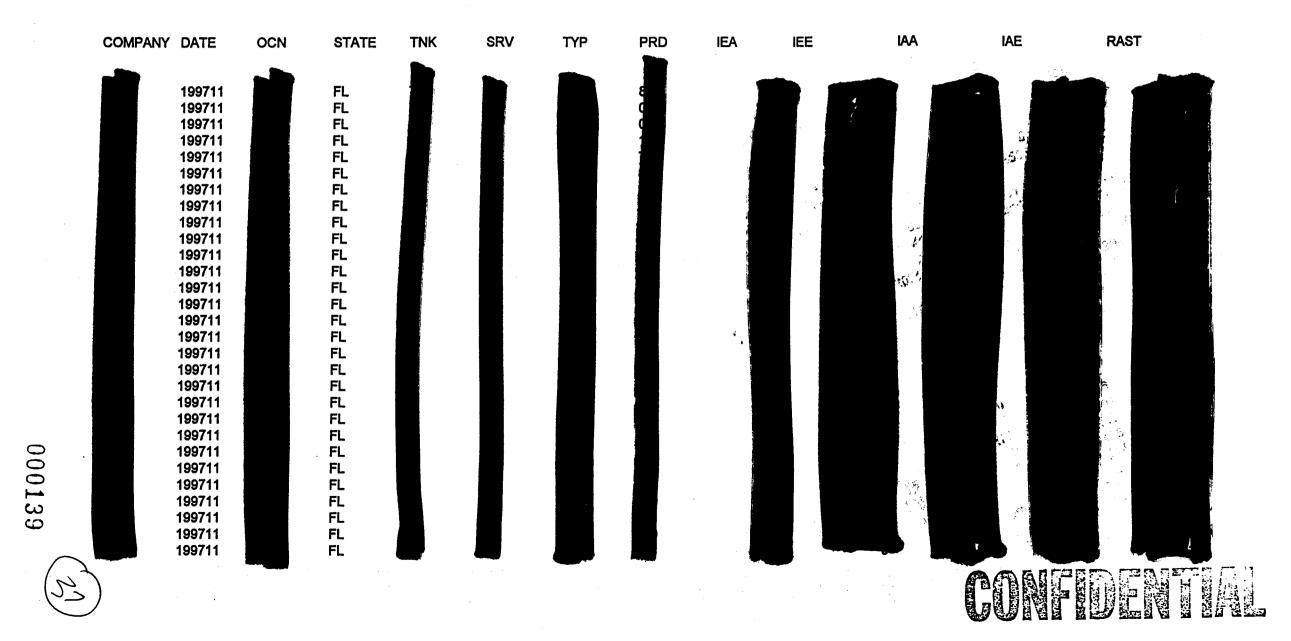




	COMPANY	DATE	OCN	STATE	TNK	SRV	TYP	PRD	IEA	IEE	IAA	IAE	RAST
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	COMPANY	DATE	OCN	STATE	TNK	SRV	TYP	PRD	IEA	IEE	IAA	IAE	RAST
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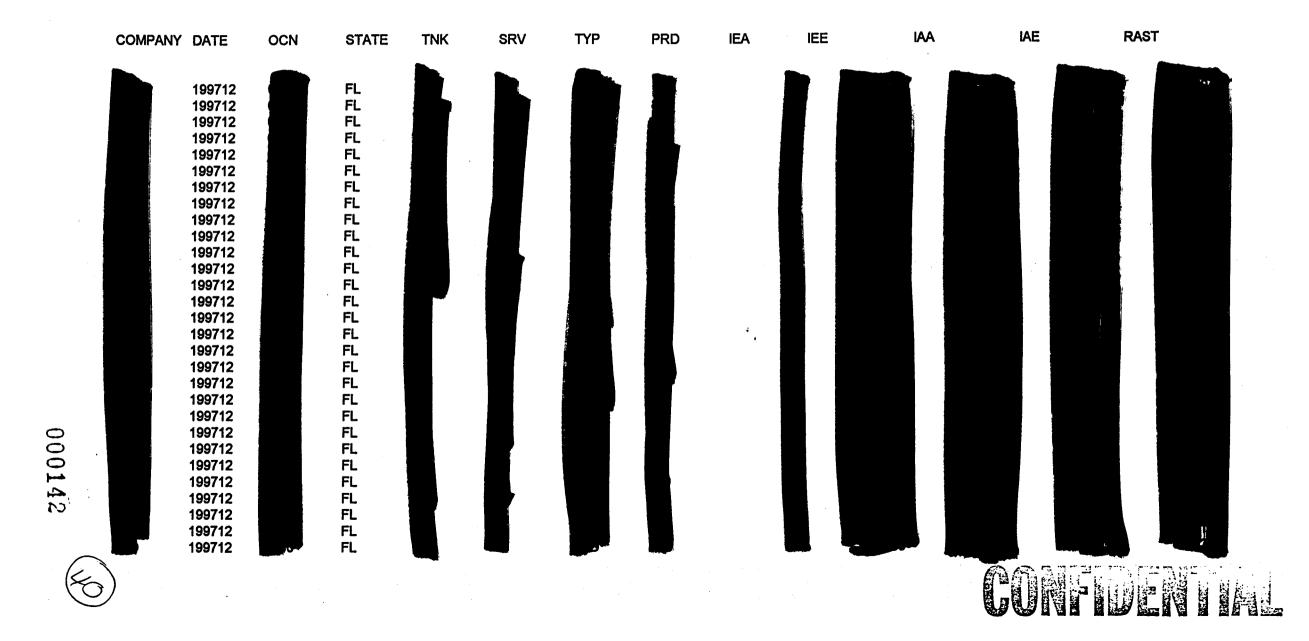


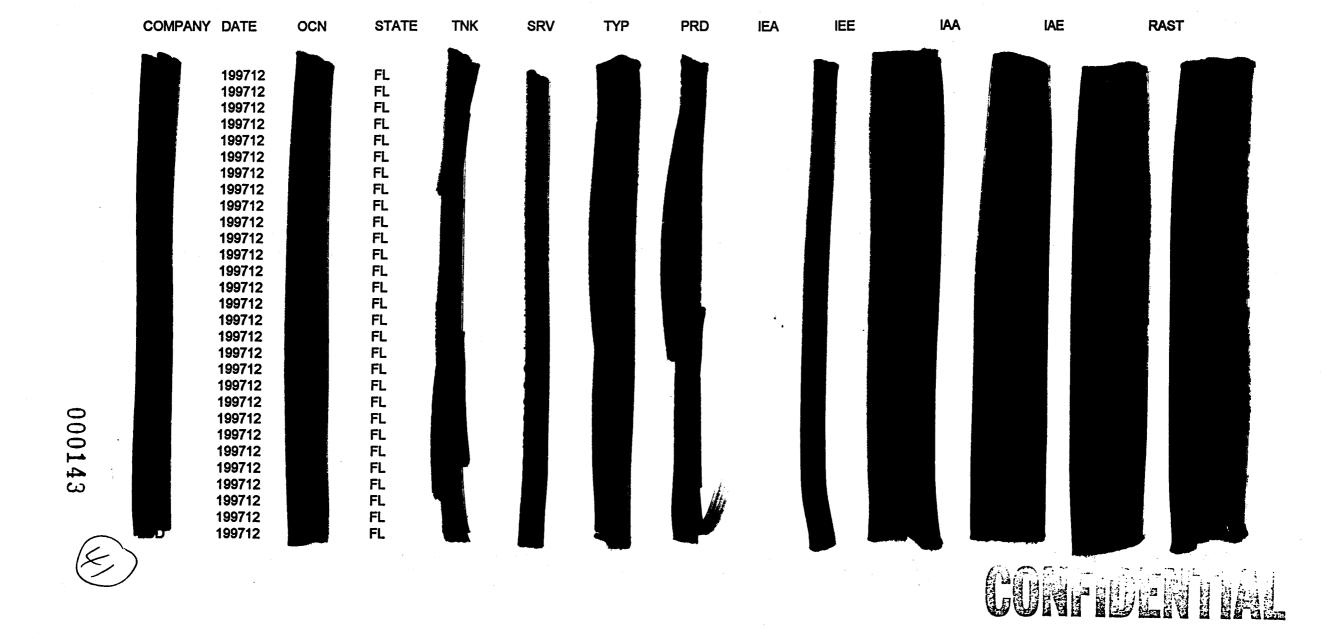


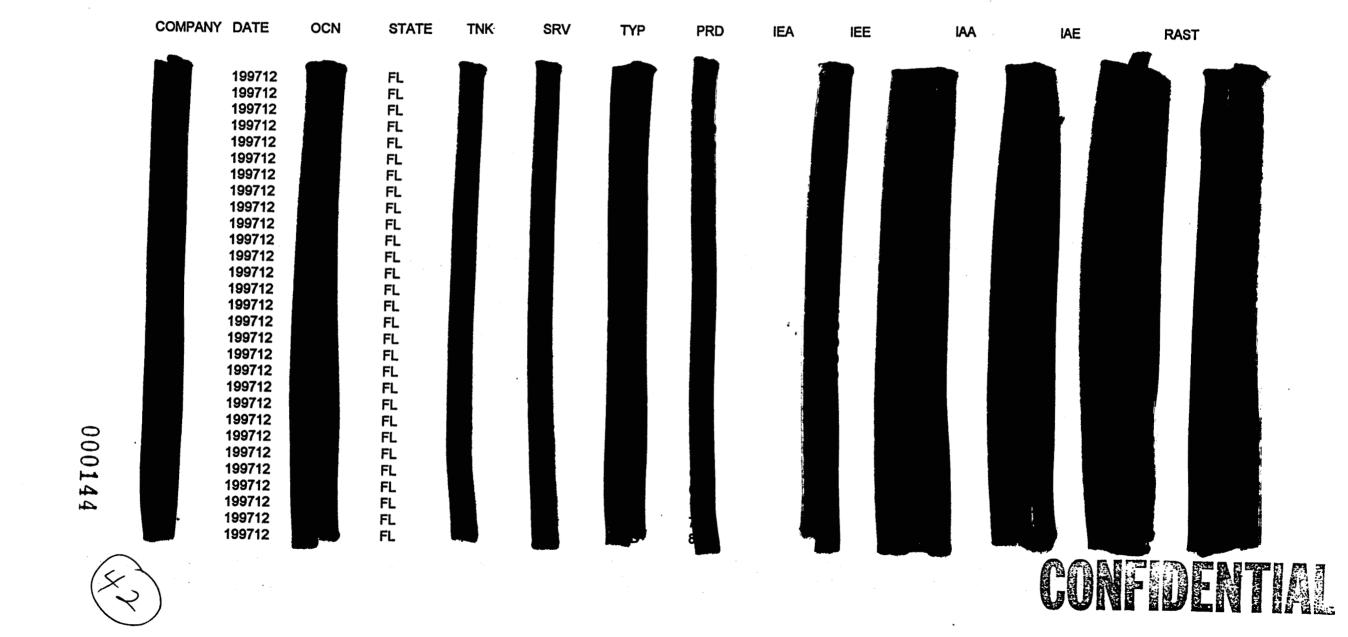
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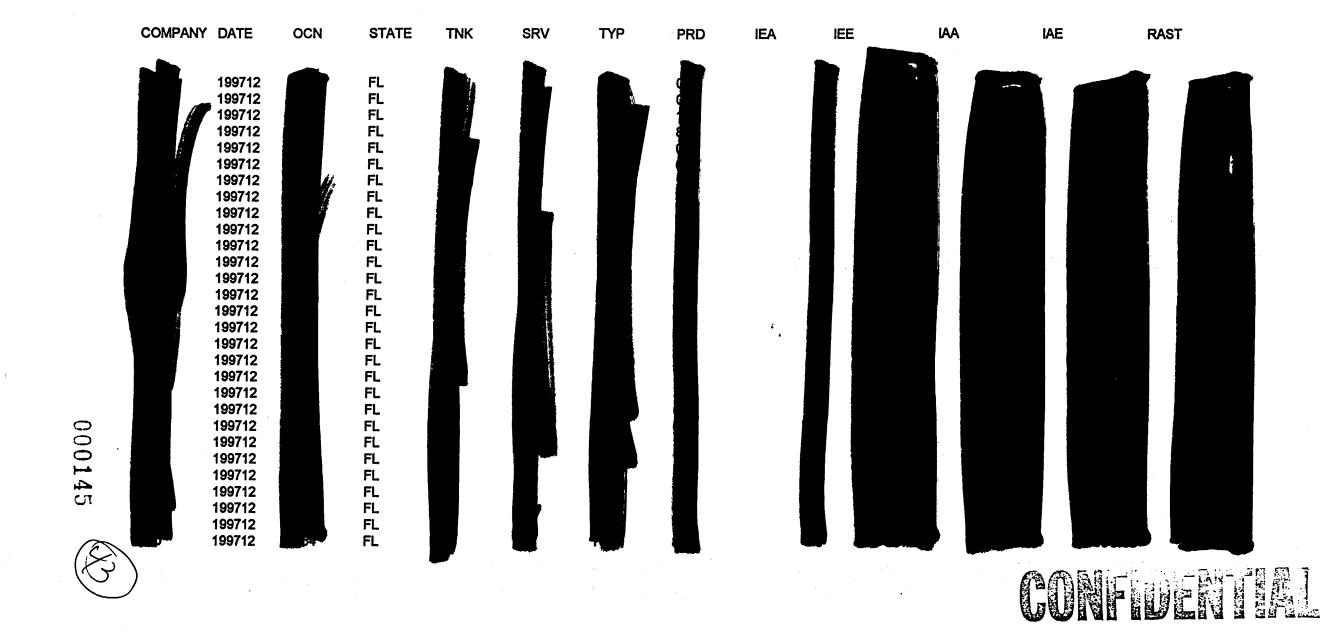
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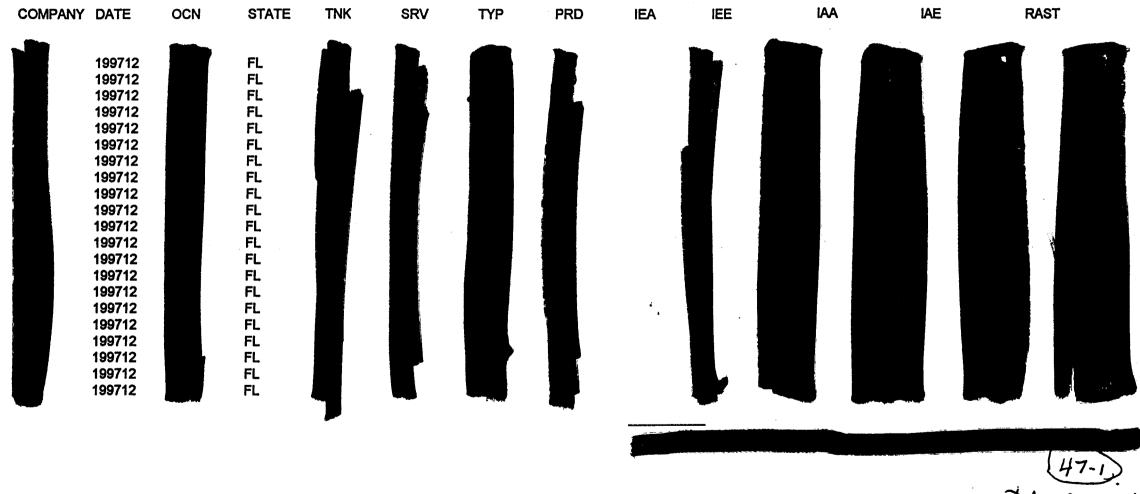
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47-5

Total Co orey + termete Minute for 40097 H2) Oct How Then Estimate & Antrustale Perenne Used on WP 45 WorldOne Revenue Base 1998/Jan 1998/Feb 1998/Mar 1998/Apr 1998/May 1998/Jun 1998/Jul 1998/Aug 1998/Sep 1998/Oct 1998/Nov 1998/Dec 3 month ave Source: ¿Co renenue Oce 4. Septem Rest no dre m but probably a more paying whate was in rename as it siples See attacked

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Fax: 70-284-5488

BBU

Florida Access Reduction

Revenue Summary

Commercial

Commercial Products	Cur	rent Monthly	Proposed Monthly Revenue		Reduction
WorldOne Switched	\$	<u>Yeveline</u>	Revenue	Execucion(2)	
WorldOne Dedicated Commercial Total	\$				

Annual notals S

Consumer

Consumer	Cumentlyoniny * Revenue	Proposed Monthly Revenue	Reduction (5)	हरकामस्याजाः (%)
Home Advantage Plan TTI Combined Calling Plan	\$ 63	\$	\$	
Home Advantage Easy Plan		\$ \$	\$ \$1.5	

***Annual Consumer Total *** \$ 1280 \$ 761 495 \$ 5 66 217 7 17 1/a

Biztel

Marie (Fig. 1)	Current Monthly	Monthly:	r Reologion (Reduction
Biztel	n/a	n/a	\$	n/a
WWW.BizielsTotal	the sample of the	isi/ani/ansi-		in/c

Wholesale

	Current Monthly	Proposed Monthly	Contraction	Reduction
Wholesale Wholesale	Revenue n/a	Revenue n/a	Reduction:	(\$) (%). n/a
THE RESERVE AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF T	n/a - 1	i i nyar	(S)	in//a

Total Annual Reduction \$1.5

Corpany deta - no bankup.

Page 1 48p 2

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DOCUMENT NUMBER-DATE
02769 MAR-18

FPSC-RECORDS/REPORTING

COMPANY: WORLDCOM TECHNOLOGIES

TITLE: INDEX OF CONFIDENTIAL WORKPAPERS

PERIOD: JULY 1, 1998 AND OCTOBER 1, 1998

FLOW THROUGH REDUCTIONS

DATE: FEBRUARY 8, 2000

AUDITOR: RKY

		NO.OF
WP NO.	DESCRIPTION	PAGES
1	Report	23
5-1	Planning Memos	8
10-3	Requests 2,3,4,5 &6	5
105	Request 7	2
10-8	Request 10	2
10-9	Request 10A	9
10-11	Request 12	2
10-12	Request 13	3
44	Analysis of Flow Thru Work Sheets	4
44-1	Rate Changes of Biztel and CC	2
44-2	Minutes of Use determination	2
45	Oct 1 IXC Flow Through Work Sheet	2
45-1/1	WorldOne Service Tariff	1
47	Estimated Minutes of Use	4
47-1	Estimated Minutes of Use	1
47-1/1	Originating and Terminating MOUs	3
47-1/2	Actual MOUs	1
47-2	Switched Access Cost	3
47-3	Switched Access Cost	12
47-4	Estimated MOUs	2
47-4/1	Originating and Terminating MOUs	7
47-5	Company 4th Q MOUs	47
48	Revenue Base	2
49	July 1 IXC Flow Through Work Sheet	2
49-1	Infor re July reductions	6
50	Change in tariffs	7
51	Summary of Invoice Tests	1
52	Summary of Invoice Tests	2

COMPANY: **WORLDCOM TECHNOLOGIES**

INDEX OF CONFIDENTIAL WORKPAPERS TITLE:

JULY 1, 1998 AND OCTOBER 1, 1998 FLOW THROUGH REDUCTIONS PERIOD:

FEBRUARY 8, 2000 DATE:

AUDITOR: RKY

WP NO.	DESCRIPTION	NO.OF PAGES
52-1	WorldOne Invoice Test	
52-1/1	WorldOne Sample	7
52-1/2	WorldOne Sample Results	3
52-1/3	WorldOne Tarif Changes	1
52-1/4	WorldOne Reduction	1
52-1/5	Company info re WorldOne	1
52-2	Transcend Invoice Test	3
52-2/1	Transcend Rates	1
52-2/2	Transcend Rates	1
52-2/3	Transcend Rates	1
52-2/4	CCC Tariffs	3
52-2/5	CCC Tariffs	3
52-2/5-1	Transcend tariffs	1
52-2/6	Response for Req 10 an d 12	1
52-2/7	Response for Req 10	1
52-2/8	Transcend Rates	11
52-2/9	Infor re Transcend	1
52-2/9-1	Infor re Transcend	2
52-2/10	Request 13 re CC and Transcend	3
52-2/10-1	Company Response to Req	1
52-3	Summary of Classic Carrier Inovice Test	2
52-3/1	Classic Carrier Population	9
52-3/2	Classic Carrier Sample list	1
52-3/3	Classic Carrier Sample list	1
52-3/3-1	Detail of Classic Carrier Account	1
52-3/3-2	Detail of Classic Carrier Account	1
52-3/3-3	Detail of Classic Carrier Account	3
52-3/3-3/1	Detail of Classic Carrier Account	2

COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

INDEX OF CONFIDENTIAL WORKPAPERS

PERIOD:

JULY 1, 1998 AND OCTOBER 1, 1998 FLOW THROUGH REDUCTIONS

DATE:

FEBRUARY 8, 2000

AUDITOR:

RKY

WP NO.	DESCRIPTION	NO.OF PAGES	
52-3/3-4	Detail of Tanscend Account	1	
52-3/3-5	Detail of Tanscend Account	1	
52-3/3-6	Detail of Classic Carrier Account	1	
52-3/3-7	Classic Carrier Tariff	1	_
52-3/4	Information re Classic Carrier	2	
52-3/5	Correspondence re Classic Carrier	7	_
52-3/6	Request 13 re Classic Carrier and Transcend	3	
53	Tariff changes	1	_
53-2	World One and other tariff changes	2	

WORKING PAPER STANDARD INDEX World Com Technologies COST OF CAPITAL COST OF CAPITAL 32 EQUITY LONG TERM DEBT SHORT TERM DEBT CUSTOMER DEPOSITS DEFERRED TAXES TAX CREDITS **CURRENT FILES** g B ORIGINAL WORK PAPERS - FILE MAINTENANCE IN DIVISION AUDIT FINANCE CONTROL PRE **NET OPERATING INCOME** PLANNING AND CONTROL net operating income AUDIT REPORT OPERATING REVENUES COMPANY PILING MANAGEMENT REPRESENTATION LETTER AUDIT SERVICE REQUEST S (BLANNING **AUDIT PROGRAM** ANALYTICAL REVIEW EVIEW NOTES BOARD OF DIRECTORS/ LIST OF DIRECTORS AND AFFILIATES Flow ThruW/S 10/1/98 review notes external/internal/ppsc audit POCUMENT REQUESTS AND CONTROL LOG ON BOTH STREET CONFIDENTIAL DOCUMENTS CONTROL LOG TRIAL BALANCE ADJUSTMENT / RECLASSIFICATION SUMMARY SUPERVISORS REVIEW OF AUDIT INCOME TAXES DEFERRED TAXES RATE BASE Gaines / Loss Disposal Utility Plant IS RATE BASE 16 UTILITY PLANT LAND 18 PLANT HELD FOR FUTURE USE CONSTRUCTION WORK IN PROCESS OTHER INCOME CONTRIBUTIONS IN AID OF CONSTRUCTION OPERATING INCOME allowance for funds used during const. ACCUMULATED DEPRECIATION INCOME DEDUCTIONS ACCUMULATED AMORTIZATION OF CIAC 64 TAXES WORKING CAPITAL 65 INTERST CHARGES EXTRAORDINARY ITEMS

Effective Jul 1. 1998

(BC

CORRECTED ERSION IXC Flow- Throu. Work Sheet

Name(s) of IXC: WorldCom Technologies, Inc. (WTI); WorldCom Network Services, Inc. (WNS); Biztel Corp.; TTI Naional, Inc.

Study Period (one or more months in 1991: July

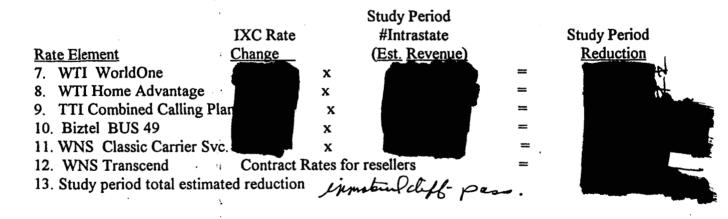
Calculation of \$ Szings and Percent Reduction

LE 1. 2. 3.	Rate Change (Orig. JCL) (Terr. CCL) (Interponnection)	x x x x	Study Period # Intrastate Est. Minutes (MOUS)	=Sw. Acc. Savings
4.	Total Sw. Acc. Savings (sum lines 1-3)			7 7
5.	Statewide intrastate log distance study period billable evenue			Not Applicable
6.	Required % reduction in IXC's FL intra- state long distance ates (line 4/line 5)	•		N.A.

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

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

Monthly Savings Spread Over Specific Rate Elements



V = ayons wy PSC letter to Codated 6/11/98 Dec 49-1 page 4



FACSIMILE TRANSMITTAL SHEET

DATE:

June 12, 1998

TO:

Michael Green 918 590 1996 Total Pages (including cover)6

FROM:

Susan Drake, WorldCom Regulatory Dept Phone 561 750-2853 Fax 561 750-2629

RE:

IXC-Florida Rates

MESSAGE:

Per Brian Sulmonetti

Heather,

Attached are the Florida rate changes filed this week. A word document (worksheet will be sent via Email)

CONFIDENTIAL

49-1

: 6-11-98 : 17:50 ;

MESSER LAW-

14077502629;# 1

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tell who to se

STATE OF FLORIDA

Commissioners: Julia L. Johnson, Chairman J. TERRY DEASON Susan F. Clark JOE GARCIA E. Leon Jacobs, Jr.



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

Public Service Commission

June 11, 1998

Letter also

TO:

Facilities-Based and Reseller Interexchange Carriers

FROM:

Walter D'Haeseleer, Director of Communications .

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

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

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

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

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

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

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULD AND TALLAHASSEE, FL 32399-0850 mall: contact@pecatates.us An Affirmative Action/Em

PSC Website: www2_scrl.ser/psc

SENT BY: MESSER LAW FIRM

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14077502629;# 2

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

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

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

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

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

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

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



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Facilities-Based and Reseller Interexchange Carriers
Page 3

June 11, 1998

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

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

LEC July 1, 1998 Intrastate Switched Access Rate Reductions

LEC	Rate Element	Current Per Minute Rate	July 1, 1998 Per Minute Rate	Rate Change
GTE Florida	Originating CCL	\$0.0224842	\$0.0202287	(\$0.0022555)
GTE Florida	Terminating CCL	\$0.0348342	\$0.0313373	(\$0,0034969)
Sprint-Florida	Interconnection	\$0.010016	\$0,007066	(\$0.002950)

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



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: B-11-9B : 17:52 ;

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14077502629;# 4

Facilities-Based ar	nd Reselle	r Interexchange	Carriers
Page 4			
Tune 11 1998			

IXC Flow-Through Worksheet

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

Calculation of S Savings and Percent Reduction

			Study Period		•
			# Intrastate	•	•
LEC	Rate Change	X	Minutes (MOUS)	=	Sw. Acc. Savings
1. GTE	\$0.0022555 (Orig. CCL)	X		=	
2.	\$0.0034969 (Term. CCL)	x		**	
3. Sprint	\$0.00295 (Interconnection)	X		==	
	w. Acc. Savings (Sum lines			-	•
5. Statew	ide intrastate long distance	,	•		
study p	eriod billable revenue		•	=	•
6. Requir	ed % reduction in IXC's FL i	ntra-			
	ng distance rates (line 4/line			200	

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

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

Example: Savings Spread Over Specific Rate Elements

	IXC Rate		Study Period # Intrastate		Study Period
Rate Element	Change	X	Minutes (MOUs)	=	Reduction
7. #1		x		==	
8. #2		x		-	
9. Study perio	d total reduct	-			

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

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LDDS-REGULATORY	Y Lan	008
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Facilities-Based and Reseller Interexchange Carriers Page 5		
June 11, 1998		
IXC Summary		
IXC:Effective date of flow-through:		
Percentage Reduction of IntraLATA	toll rates	
1. IntraLATA Toll Rate % Reduction a. Total IntraLATA Dollar Reduction* b. Total IntraLATA Revenue*		
c. Percent Reduction (line a/line b)	=	
2. LEC Percentage Switched Access Reduction (comes from IXC Flow-Through Worksheet, line 6)		
NOTE: Line 1c must be no greater than Line 2.	•	
Determination of Residence & Busines	s Calculation	
Residential Description of how dollars calculated (e.g., rate elements include	ed, etc.):	
Business Description of how dollars calculated (c.g., rate elements include	ed, etc.):	
IXC Flow-Through Summa	ary :	
1. Annualized Effect* of Flow-Through to Residential Rates	=	
2. Annualized Effect* of Flow-Through to Business Rates:		
3. Total Annualized Flow-Through* (line 1+line 2)	· =	
*Describe how calculated		
	(1) 0002	11
	IFMENILL L	3

COMPANY:

WORLDCOM

TITLE:

TARIFF COMPARISON

PERIOD:

JULY 1, 1998 TO PRESENT

DATE:

NOVEMBER 2, 1999

AUDITOR:

RKY

WP NO.

50



Staff reviewed the tariffs from WORLDCOM that were either new or increased as of July 1, 1998 to the present in order to determine if any of the tariffs that were decreased in the flow through worksheets for access charge reductions were subsequently increased.

[by/35/00



Our analysis showed that World One Dedicated Service tariff was reduced on July 1, 1998 as part of the company's reduction to customers for reduced access charges. This same tariff was further reduced on October 1, 1998 for the same reason. This rate element (WorldOne Dedicated Service) appears on both the July and October 1998 flow through worksheets as a reduction to the customers.

This same rate element was then increased on May 18, 1999. The effect of the increase is shown on the attached staff schedules Sop 2

The remain of the tariffs that were increased prior to the July 1 reduction is in Section 53

CONFID 50p1 000212 COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

COMPARISON OF WORLDONE SWITCHED AND

DEDICATED TARIFFS

PERIOD:

JULY 1, 1998, OCTOBER 1, 1998 AND MAY 18, 1999

DATE:

SEPTEMBER 8, 1999

AUDITOR:

RKY

WP NO.

50-5

WorldOne Service		WP 46-1p7	WP45-1p8		WP 50-4p10		
InterLATA Rate Schedules		FPSC Tariff 4 5th Revised	FPSC Tarif 4 6th Revised		FPSC Tariff 4 7th Revised	Increase (Decrease)	increase (Decrease)
		Sheet No 165 July 1, 1998	Sheet No. 165 October 1, 1998	('Decrease)	Sheet No. 165 Mary 18, 1999	May 18, 1999 over October 1, 1998	May 18, 1999 over July 1, 1998
Switched Per Minute							
Monthiy Outbound		0.1464	0.1376	-6.0109%	0.1477	7.3401%	0.8880%
Monthly Inbound		0.1559	0.1465		0.1573	7.3720%	0.8980%
12 month ESP-Out		0.1418	0.1333	-5.9944%	0.1430	7.2768%	0.8463%
12 month ESP-In		0.1418	0.1333	-5.9944%	0.1430	7.2768%	0.8463%
24 month ESP -Out		0.1371	0.1289	-5.9810%	0.1382	7.2149%	0.8023%
24 month ESP-In		0.1371	0.1289	-5.9810%	0.1382	7.2149%	0.8023%
Dedicated Per Minutes		,					
Monthly Outbound		0.1068	0.1047	-1.9663%	0.1048	0.0955%	-1.8727%
Monthly Inbound		0.1164	0.1141	-1.9759%	0.1144	0.2629%	-1.7182%
12 month ESP-Out	Z-X-		0.0999	-1.9627%	0.1001	0.2002%	-1.7664%
12 month ESP-In		0.1019	0.0999	-1.9627%	0.1001	0.2002%	-1.7664%
24 month ESP -Out		0.0970	0.0951	-1.9588%	0.0953	0.2103%	-1.7526%
24 month ESP-In		0.0970	0.0951	-1.9588%	0.0953	0.2103%	-1.7526%
	62.0						
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WORLDCOM TECHNOLOGIES NEW SERVICES AND INCREASES FROM 7/1/98 TO PRESENT SEPTEMBER 8, 1999 RKY

WPNO. 50

Staff requested all new services and all increases in services form 7/1/98 to present to determine if any of the rate elements that were decreased on the IXC Flow Through WorkSheets were subsequently increased again. One tariff appears to have been decreased on the July 1, 1998 and October 1, 1998 Flow Thru IXC Worksheets and subsequently increased effective May 18, 1999. See WP 50-5 for complete explanation.

NEW SERVICES 7/1/98 - Present

1. EFFECTIVE
OCTOB ER 16, 1998
FPSC Tariff No.4
Original Sheet 109.28
Paragraph 3.30.5
MCI WORLDCOM On-Net Service-Voice

There is no rate element with this name on the flow thru work sheets and this is the original tariff sheet.

2. Effective December 5, 1999

Biz-Tel Dedicated Access Service

FPSC Tariff No. 1

Original Sheet No. 24.4

There is no rate element with this name on the flow thru work sheets and this is the original tariff sheet. 50-2

3. Effective October 1, 1998

BizTel Switched Service

FPSC Tariff No. 1

Original Sheet No. 23.8

There is no rate element with this name on the flow thru work sheets and this is the original tariff sheet. 50 - 2

4. Effective April 19, 1999

TTI Nation Term Plan

FPSC Tariff No. 1

Original Sheet 29

This is different than the rate element on the IXC Flow thru work sheet on WP 45_x.

This is also an original tariff sheet.

50p3

WORLDCOM TECHNOLOGIES NEW SERVICES AND INCREASES FROM 7/1/98 TO PRESENT SEPTEMBER 8, 1999 RKY

WPNO. 50

Staff requested all new services and all increases in services form 7/1/98 to present to determine if any of the rate elements that were decreased on the IXC Flow Through WorkSheets were subsequently increased again. One tariff appears to have been decreased on the July 1, 1998 and October 1, 1998 Flow Thru IXC Worksheets and subsequently increased effective May 18, 1999. See WP 50-5 for complete explanation.

Staff also requested any services from 7/1/98 to present that were decreased or deleted to determine if any services offset the increases form 7/1/98 to present.

The services increased and decreased are so diverse that except for the one item on the flow thru worksheet, it is not possible to analyze the effect.

DECREASED OR DELETED SERVICES 1/1/98- Press

- 1. Effective October 1, 1998 Prior July 1, 1998 Home Advantage Service- Not on flow thru worksheet - WP 50-6
- 2. Effective October 1, 1998 Prior October 1, 1997 Home Advantage Easy Plan - Not on Flow thru worksheet - WP50-6
- 3. Effective October 1, 1998- Prior July 1, 1998
 World One Service On Flow Thru Worksheet See 50-6 and WP 50-5.
- 4. Metro Frame Relay Service Effective November 21, 1998 Prior April 10, 1998

 Not on Flow thru worksheet- Some items increased and some decreased. Also new services on 50-4p1 shows another part of the Metro Fram Relay Service increased. One does not relate to the other.
- 5. Combined Business Calling Plan Service Effective Oct 1, 1998 Prior Mar 19, 1998 Not on Flow Thru Worksheet
- 6. Combines Business Calling Plan Service Plan C Effective April 28, 1999-Prior April 1, 1999



7/1/98 to Present. **INCREASES IN SERVICES**

1. WORLDCOM Technologies

Effective November 21, 1998

FPSC Tariff No. 4

1st revised sheet No. 109.1

Cancels Original Sheet No. 109.1

New turff shows increose Metro Frame Relay Service 50-4pg1 This rate element is not mentioned in the IXC Flow Thru work sheets on 45 an 49.

2. WORLDCOM Technologies

Effective May 18, 1999

FPSC Tariff No. 4

2nd Revised Sheet No. 130

Cancels 1st Revised Sheet no. 130

On-Line Card Service

This rate element is not mentioned in the IXC Flow Thru work sheets on 45 and 49. WP 50-4page 2 Now Good Shows Microscope

3. World Com Technologies

Effective May 18, 1999

FPSC Tariff No 4

3rd Revised Sheet No. 139

Cancels 2nd Revised Sheet No 139

Directory Assistance Rates and Credit Card Reader Phones

This rate element is not mentioned in the IXC Flow Thru work sheets on 45 an 49. WP 50-4page 3 new long shows movement

4. WORLDCOM Technologies

Effective May 18, 1999

FPSC Tariff No. 4

4th Revised Sheet NO. 141.2

Cancels 3rd revised sheet No. 141.2

Phone Pass Service, LDDS WORLDCOM Calling Card Services

WP 50-4pg 4) New touth slow ixarese

5. WORLDCOM Technologies

Effective May 18, 1999

FPSC Tariff No. 4

6th Revised Sheet No. 147

Cancels 5th Revised Sheet No. 147

Answer Services

WP. 50-4 page 5) new torth shows moreuse

6. WORLDCOM Technologies

CONFIDENTIA

50R.5 000216 Effective May 18, 1999 FPSC Tariff No. 4 3rd Revised Sheet No. 150 new tariff show encress Cancels 2nd Revised Sheet No. 150 On Line Answer Card Service WP 50-4 page 6

7. World Com Technologies

Effective May 18, 1999

FPSC Tariff No. 4

6th Revised Sheet No. 153

Cancels 5th Revised Sheet No 153

Easy Answer Services

now tenf show eneme WP50-4page 7

8. World Com Technologies

Effective May 18, 1999

FPSC Tariff No. 4

6th Revised Sheet No. 161

Cancels 5th Revised Sheet No. 161

Performance 2000

5th Revised Sheet No 162

Cancels 4th Revised Sheets no. 162

WP 50-4 Pages 8 and 9)

Performance 4000 Service new tariff from gnessore
WP 50-4 Pages 8 and 0

9. World Com Technologies

Effective May 18, 1999

FPSC Tariff No 4

7th Revised Sheet No. 165

Cancels 6th Revised Sheet No. 165

Paragraph 4.14 WorldOne Service -

Paragraph 4.14.1 Usage Charge

C. Per Minute Rates Month to Month InterLATA Rate Schedules for Switches and Dedicated.

The rates for this service are reduced on both the July 1, 1998 and October 1, 1998 IXC Flow Through Work Sheets. It appears there is an increase on the May 18, 1999 tariff. See WP 50-5 for complete comparisons.

10. World Com Technologies

Effective May 18, 1999

FPSC Tariff No. 4

5th Revised Sheet No. 166

Cancels 4th Revised Sheet No 166

WorldOne Service Continued from no. 9 above. However, this part of the

with 50-4page 11. we tauff phone errores.

11. There are 8 more tariff revisions effective May 18, 1999 on WP 50-4 pages 12 through 16 and WP 50-4 pages 20 through 22.

None of the rate elements effected are on the IXC Flow Through work sheets.

12. There are three more tariff revisions effective November 21, 1998. These are on WP 50-4, pages 17, 18 and 19. None of the rate elements effected are on the IXC Flow Through work sheets.



COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

TEST OF CUSTOMER BILLS

PERIOD:

COMPARISON OF SEPT 98 AND NOV 98

DATE: AUDITOR: **SEPTEMBER 9, 1999**

RKY

WP NO.

51

Staff selected the October 1, 1998 IXC Flow Thru Worksheet to audit because the company said the customer bills that we needed to test the July 1, 1998 IXC Flow Thru Worksheet were no longer available. Because the October 1, 1998 reduction was to be staff decided that to audit the October 1, 1998 would be OK.

reduction to the life ifferent rate elements. Because the company said it would be difficult to get a list of all the customers, staff decided to select the elements to audit the customer bills for reductions.

The three elements with the largest estimated dollar reductions per month are WTI World One Switched Service and Classic Carrier and Classic Carrier Service because the company said there were only about a customers and WorldOne Switched Services because the reduction in the actual tariff was a from the prior tariff. The World One Dedicated Service was only a reduction. Staff felt it would be easier to see a reduction in the customer bills with a higher to than a lower as the company said that there are also discounts for certain amounts of usage.

Also, the WNS Transcend element on WP 45 is reduced by The company says this is by contract and is audited separately on WP NO.

in effect, staff selected two rate element to check customer bills and one element to check the contracts.

CONCLUSION:

Der S2pay1,2,3,4,



000219

Km/125/20

fy 1/31/2000

AUDIT DISCLOSURE 2

SUBJECT: SAMPLE OF INVOICES

STATEMENT OF FACTS: The company reduced eight specific rate elements to pass through the Local Exchange Company Access Charge reductions to its customers. Four rate elements were selected to test the rates before and after the October 1, 1998 reduction. These are "WTI WorldOne Switched and Dedicated Service", "Classic Carrier Service" and "WNS Transcend."

As there were discrepancies in the tariffs compared with what the company was billing its customers, the company was asked to review the amounts billed to its customers for the other four rate elements included on the Interexchange Flow-Through Work Sheets. The review of these other four elements will be addressed in a supplemental audit .

"WTI WorldOne Switched and Dedicated Service" (2 elements)

45)	On the October 1, 198 Interexchange Carrier Flow-Through Work Sheet this element accounted for the total monthly estimated reduction of the total monthly estimated reduction es
49)	July 1, 1998 Flow-Through Work Sheet was property of the total estimated monthly reduction of or the company reduced their rates to coincide with the
2-1) { 	reductions on the Interexchange Flow-Through Work Sheet, staff tested September and November 98 invoices to customers. It was determined that the customer was being billed the tariff in effect October 1, 1996 for both months. The company said that the increase submitted to the Commission effective April 10, 1998, and the decreases submitted effective July 1, 1998 and October 1, 1998 were never billed to the customers. The company also said that the customer was billed the October 1, 1996 rate until May, 1999.

(3) 1

Calculation of the amount that was not passed through to the customers is on Schedule 1 attached to this disclosure.

OPINION: Since the company did not flow through their reductions calculated on the Interexchange Carrier Flow-Through Work Sheets, the Customers did not benefit from the reductions. Based on the attached schedule, arrangements should be made to pass through to the customers.

"Classic Carrier Service"

TO BE COMPLETED WHEN GET ANSWER TO REQUEST 13

He Payo 32-3

"WNS Transcend"

On the October 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the total estimated reduction of the supplier of the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Work Sheet this element accounted for the fully 1, 1998 Interexchange Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through Carrier Flow-Through

52R1

(49)

1998 Flow-Through Work Sheet was

of the total estimated reduction of





The company explained that the "WNS Transcend" rate element is a contract with resellers. The resellers get three different parts on their bill.



In order to determine if the rates were reduced, the contracts with the resellers were requested to determine the prior rates and the new rates. The company said the contracts were generic and we would not see rates, but there was a clause that says that any access fee reductions from the local Exchange Companies would be passed through to the customer. The company said that they would only provide the generic contract to order to maintain the necessary confidentiality of very sensitive information.

Through discussion with company personnel, we were provided with company calculations for the July and October 1998 reductions to try to determine if the access fee reduction was in fact passed through to its "WNS Transcend" customers.

(50-2

OPINION: Calculations for the GTE reduction show that the reduction by WorldCom were very close to the reduction in the GTE tariff. The Sprint tariff and the company calculations were not close. The reduction to the WorldCom customer was higher than was called for in the Sprint tariff. The company explained that there could be many reasons why the customer received a higher reduction. It might be that the customer was over billed in prior month in error an the customer was getting the credit along with the reduction for the access charged making the rate lower. The company does not know what happened here. We can conclude though that the reduction billed the customer is much lower than the reduction called for in the Sprint tariff.

Although we could determine that a rate reduction was calculated, , we did not have the invoice data to show that the rate was billed to the customers.

Waiting for answer to key 13 Verhalreply screp no way to determent the rate par minute now (2/4/00)

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COMPANY: WORLDCOM TECHNOLOGIES

TITLE:

WTI WORLDONE SWITCHED SERVICE ELEMENT

DATE:

JANUARY 24, 2000

AUDITOR:

RKY

WP NO.

52-1

Workpaper 51 explains the reasons for selecting this rate element for testing. We were provided with a list of approximately sustomers. From this staff reduced the list to and them selected customers to test the September and November 98 bills. September 98 to determine if the July 1, 1998 reduction took place and November 98 to determine if the October 1998 reduction took place.

WP 52-1/1 the list selected.

52-1/2 is the sample test.

Before staff could review that sample invoices we received a call from Brian Sulmonetti indicating that there was a problem with the WorldOne Sample invoices. A meeting was set up with Brian and and Chris Pace on January 25. We were informed that the company used the October 1. 1966 tariff to bill the customers for both September and November 98 sample months. The company said that the increase submitted to the Commission effective April 10, 1998, and the decreases submitted effective July 1, 1998 and October 1, 1998 were never billed to the customers. The customer was billed the October 1, 1996 rate until May, 1999.

Staff then tested the sample to determine if the company in fact used the October 1, 1996 WorldOne Tariffs. The results of this test show:

Sample number

25 September 98 and 25 November 98 for a total of



18 customer invoices

Billed the October 1, 1996 tariff rates.

22 customer invoices

Not enough detail on the customer b ill to determine the

rate per minutes being billed the customer.

8 customer invoices

The rates per minute billed, do not match any tariff we could determne. However it appears that the rates are lower than The October 1, 1996 Switched tariff and higher than the October 1,

1996 dedicated tariff.

2 customer invoices

No Fl intrastate calls

Total 50 invoices

Since the company did not flow through their reductions calculated on the Interexchange Carrier Flow Through Worksheets, the customers did not benefit from the reduction of the access charges from the Local Exchange Companies.

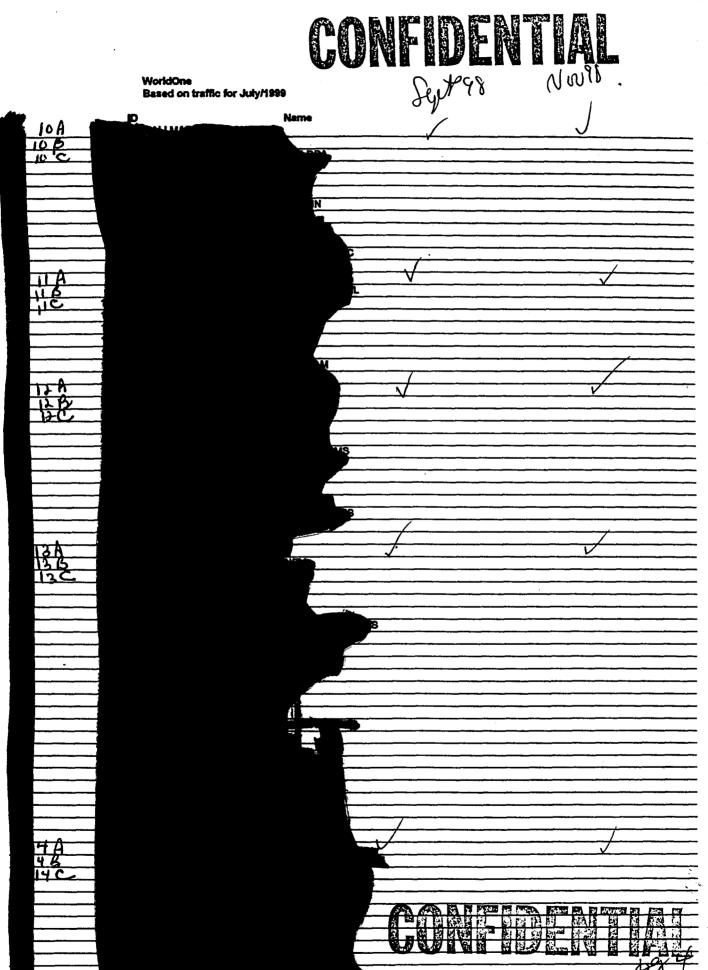
WA 52-1/4 the calculation of the amounts
that was not flowed three to the customer

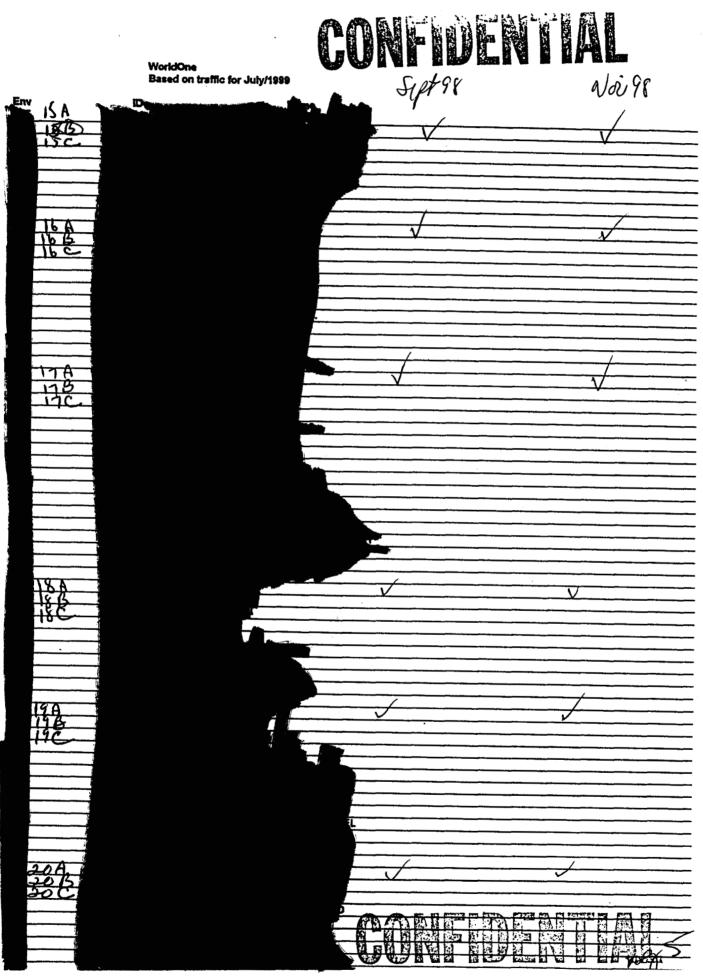
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FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: Brean Jalnoville	<u> </u>
UTILITY: Worldcom,	- -
FROM: (AUDI MANAGER)	(AUDITOR PREPARING REQUEST),
REQUEST NUMBER:	_ DATE OF REQUEST: 10/13/99
AUDIT PURPOSE: TXC Goccess	
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED	BY: 10/4/99 (WATE)
REFERENCE RULE 25-22.006, F.A.C., THIS REQ	UEST IS MADE: INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
ITEM DESCRIPTION:	D 00131DE UI AN INQUINI
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THE REQUESTED RECORD OR DOCUMENTATION:	these were our attentes
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	TARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED I
(3) AND IN MY OPINION. ITEM(S) 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFINENCE, FILE AND AND REPORTING. REFER TO RULE 25-22.006, F	IDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSO REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION O
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMO	RANDUM)
	(SIGNATURE AND TITLE OF RESPONDENT)
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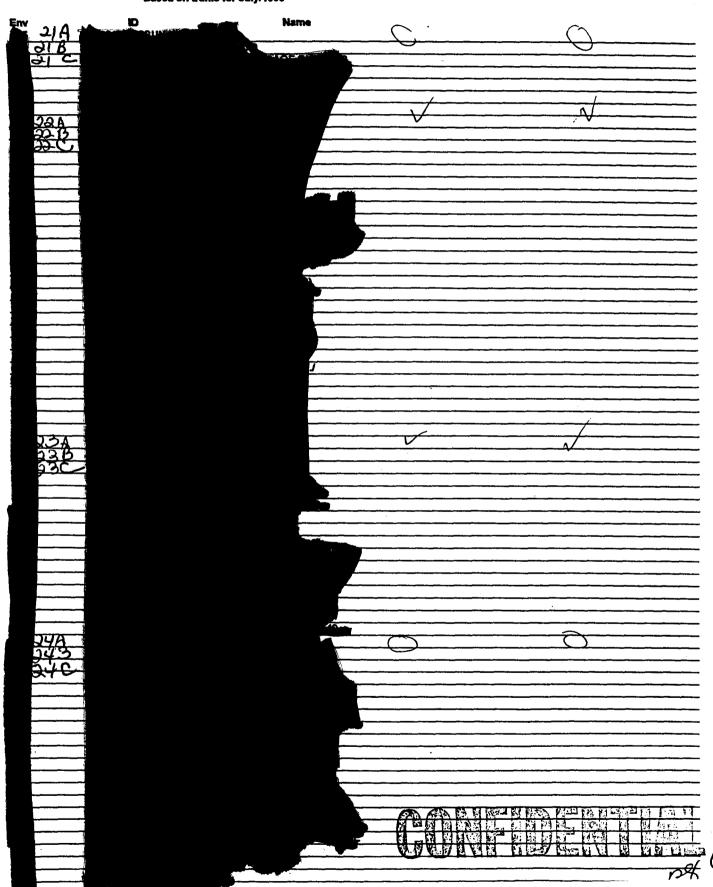
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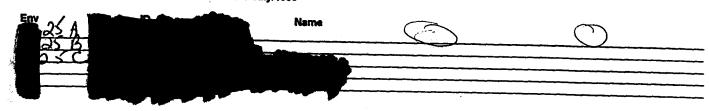
WorldOne
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COMPANY: **WORLDCOM TECHNOLOGIES** SAMPLE OF WTI WORLDONE SWITCHED SERVICE TITLE: PERIOD: SEPT 98 AND NOV 98 **JANUARY 24, 2000** DATE: **AUDITOR:** WP NO. WP 52-1/2 Sample Nb 71 Cust no. No. **1A** For both Sept and Nov 98 cannot relate the invoices to the tariffs for each month. The day after receiving this sample, Brian Sulmonetti called and said there was a problem with the WTI WorldOne sample and he would like to come to our offices and speak with us. This was set up for January 25, 2000. We were informed at that meeting that the company used the October 1, 1996 tariff to bill the customers for both Sept and Nov 98. The increase submitted to the Commission effective April 10, 1998, and the decreases submitted effective July 1, 1998 and October 1, 1998 were never billed to the customers. There was not enough detail on the Sept and Nov invoices to determine the rate per minute. リ 2A Not enough detail on either the Sept or Nov 98 bill to relate the invoices to the tariffs. 3) 3A The September 28 bill for August and September traffic shows the customer is being billed the October 1, 1996 rate. OF There is not enough detail on the 11/26 bill to determine what the company billed. 4) 5A The Setpember 12 bill for August and Sept traffic shows the customer is being billed the October 1, 1996 rate $(0 \, k)$ The November 13 bill for October and November traffic shows the customer is being billed the same rate as the September 12 bill. (October 1, 1996). () 6A The September 15 bill for August and Sept traffic is not the July 1 tariff. The October 1, 1996 tariff is being billed OK It appears that the Nov 15 bill for October and November traffic shows the same amount being billed the customer as the September 15 bill. (october 1, 1996). '2) 7A The Oct 3 bill for Sept_traffic shows the customer being the October 1, 1996 tariff OF The Dec 1 bill for November traffic shows that the company is using the October 1, 1996 (1) 8A The customer is being billed the October 1, 1996 tariff for both months of the sample.

COMPANY: **WORLDCOM TECHNOLOGIES** TITLE: SAMPLE OF WTI WORLDONE SWITCHED SERVICE PERIOD: SEPT 98 AND NOV 98 DATE: **JANUARY 24, 2000 AUDITOR: RKY** WP NO. WP 52-1/2 Sample No. Cust no. Name 3) 9A The rates per minute on both bills (9/28 and 11/26) do not match any tariffs. (K) The rates per minute on both bills (9/26 and 11/24) do not match any tariffs. (2/26)֏) 10A 6) 11A The customer is being billed the October 1, 1996 tariff for both months of the sample! 0 k 1)12A For both the September 23 invoice and the November 20 inovice we cannot tell what tarif is being billed. We can tell that the tariff is lower than the October 1, 1996 switched rate and higher than the October 1, 1996 dedicated rate. The customer is being billed the October 1, 1996 tariff for both months of the sample. **以13A** 3) 14A There is not enought detail on both invoices to determine what rate per minutes if being billed to the customer. The customer is being billed the October 1, 1996 tariff for both months of the sample. *l)* 15B No Florida Intrastate calls on either month bills. () 5) 16A For The Sept 9 invoice the customer was billed the ,) 17A October 1, 1996 tariff (0/~) For the 11/9 invoice, there was not enough detail to deterine the rate per minute (D)) 18A The customer is being billed the October 1, 1996 tariff for both months of the sample. (3 k) For both months, there is not enough detail to determine the rate per minutes. (D)) 19A **少20A** For both months, there is not enough detail to determine the rate per minutes D) 22A For both months, there is not enough detail to determine the rate per minutes DD) 23A For both months, there is not enough detail to determine the rate per minutes \widehat{D} \widehat{D}

For both months, there is not enough detail to determine

the rate per minutes

4B

WORLDCOM TECHNOLOGIES

TITLE:

SAMPLE OF WTI WORLDONE SWITCHED SERVICE SEPT 98 AND NOV 98 JANUARY 24, 2000

PERIOD: DATE:

AUDITOR:

RKY

WP NO.

WP 52-1/2

Sample

No.

Cust no.

Name

(^{ე5)} 3B

The tariff charged the customer is lower than the October 1, 1996 tariff. On the top of the bills for both months it sayd Special Pricing Customer.

For both months, there is not enough detail to determine the rate per minutes \mathcal{D}

For both months, there is not enough detail to determine the rate per minutes.

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TITLE: PERIOD: WORLDCOM TECHNOLOGIES CHANGES IN TARIFFS

PRIOR TO AND AFTER JULY AND OCTOBER RATE REDUCTIONS

DATE:

JANUARY 25, 2000 RKY

AUDITOR:

Tangs Inbritted to The Corn.

WORLD ONE SERVICE	3RD Revised	4th Revised	5th Revised	6th Revised	FPSC Tariff No 4 7th Revised
INTERLATA	Sheet 165 1 0/1/96	Sheet 165 4/10/98	Sheet 165 7/1/98	Sheet 165 1 0/1/98	Sheet 165 5/18/99
Switched Per Minute					
Monthly Outbound Monthly Inbound	0.1395 0.1485		0.1464 0.1559	0.1376 0.1465	
12 Month ESP Out and In	0.1350	0.1512	0.1418	0.1333	0.1430
24 Month ESP Out and In	0.1305	0.1462	0.1371	0.1289	0.1382
Dedicated Per Minute					
Monthly Outbound Monthly Inbound	0.0990 0.1080			0.1047 0.1141	0.1048 0.1144
12 Month ESP Out and In	0.0945	0.1087	0.1019	0.0999	0.1001
24 Month ESP Out and In	0.0945	0.1035	0.0970	0.0951	0.0953

tings that were used the the Dald One customers

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COMPANY: TITLE:	WORLDCOM TECHNOLOGIES CALCULATION OF WORLDONE	
PERIOD: DATE: AUDITOR:	SERVICE REDUCTION JULY 1 AND OCTOBER 1, 1998 JANUARY 31, 2000 RKY	12/2/100
WP NO.	52-1/4	
Company Calculated Flow-Through	IXC WorkSheet July 1, 1998 Estimated Monthly Reduction (4)	98 athly
Rate Element		
WTI World One Switched WTI WorldOne Dedicated WTC World One		
Times 12 for the yearly effect		12
(W.D	442	
	s and s would decrease the amount omers because of this WTI WorldOne	
Audit Disclosure shows that the yearly amount of larger reduction to customers in company is passing through a		enough to the customer in mpany was passing through a is a net of that the
⊗ Not Separated on IXC W	workshelt between Switchel	· Declicatel

CONFIDENTIAL

52-1

Letter to Ms. Young December 17, 1999 Fin ixe

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

9. Account

10/98 - invoice included as Exhibit G

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

10. Account

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

WorldCom Technologies

Request No. 11

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

2. Requests 10 and 12

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

3. Classic

See Exhibit H

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

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

Sincerely,

Julie L. Davis

Regulatory Manager

53-1

WORLDCOM

TITLE:

ANALYSIS OF TRANSCEND ELEMENT

PERIOD:

REDUCTIONS

DATE:

JANUARY 5, 2000

AUDITOR:

RKY

WP NO.

wp52-2

Summary of telephone conversation with Michael Green of MCI Worldcom regarding the Transcend element reduction.

On the October 1, 1998 IXC worksheet this element accounted for of the total estimated On the July 1, 1998 IXC worksheet this element accounted for reduction of /P 45 and 49.

The company explained that the Transcend rate element is a contract with resellers. The resellers get three different parts on their bill. Two parts are access fees, both originating and terminating and the third part is the long distance element. The access fee reduction goes straight to the reseller (the company makes up their cost and profit on this part by adding an administrative fee to the access fees) Originating and terminating are different fees.

As GTE and Sprint were ordered to reduce their access fees to Worldcom, Worldcom had to reduce access fees to their resellers.

In order to determine if the rates were reduced staff requested the contracts to determine the prior rates and the new rates. The company said the contracts were generic and we would not see rates,, but that there was a clause that says that any access fee reductions from LECs would be passed through to the customer. They said that they would only provide the generic contract in order to maintain the necessary confidentiality of very sensitive information. (Letter from Worldcom) WP ______.

Through discussions with company personnel, we were provided with the following to try to determine if the access fee reduction was in fact passed through to their Transcend customers.

The company provided us with a Confidential disk which included five files.

File 1 contains the actual LEC reductions for July and Oct and included the company's actual average reduction for both GTE and Sprint.

VVP 52-2 The amounts appear to be close for GTE but not for Sprint. (Explained below).. The company stated that the average reductions were calculated from the company "LEC Tariff Data Base" with information for the months of September 98 and October 98. The average reductions are calculated on File 3 and WP No. 62-2/2.

The company calculated the reductions for July and Oct as follows:

1. Determined the amount the LEC reduced the tariff (from the ariffs). Reduced the estimated cost per minute for access charges for the exact amount and came up with new access charges to bill their contract customer. Wp 52-2/3. In the case of GTE the LEC reduced the Carrier Common Line part of the access charge. Sprint reduced the Local Transport RIC part of the access charge. see 52-2/3.

The company's calculation shows that they reduced each element mentioned above in the correct tariff amount for both July and October. See 52-2/3.

2. In order to show us that the total access charge billed to the customer was reduced, the company performed the following:

a. Determined the average interLata cost per minute billed to the customer for the month of 9/98 and same for 11/98 from data that was extracted from the company "LEC Tariff Data Base".

b. Subtracted the 9/98 average from the 11/98 average for each type of call e.g. interLata, IntraLata for originating and terminating for both GTE and Sprint to come up with the reduction.

c. Compared the average reduction to the actual reduction from the LEC

d. It is up to staff to compare the average reductions and the actual reduction to the actual data for 9/98 and 11/98 send to us on disk from the company to see if the billings are reduced.

Also, if staff can sort the data on excel we can recalculate the averages.

CONFIDENTIAL

KM/25/00

WORLDCOM

TITLE:

ANALYSIS OF TRANSCEND ELEMENT

PERIOD:

REDUCTIONS JANUARY 5, 2000

DATE: AUDITOR:

WP NO.

wp52-2

RESULTS OF COMPARISON OF COMPANY CALCULATED AVERAGE AND ACTUAL GTE AND SPRINT

TARIFF

Results of the comparison show that the average reduction for GTE calculated by the company is very close to the actual reduction in the GTE tariff. The rate billed the customer is very close to what is in the tariff.

A . W. w.



The Sprint tariff and the average calculated by the company are not close. On 52-2/1 it shows that the reduction to the customers was higher than was called for in the Sprint tariff. The company explained that there could be many reasons why the customer received a higher reduction. It might be that the customer was overbilled in prior months in error (which has been known to happen) and they were getting the credit along with the reduction for the access charges making the rate lower. The company does not know what happened here. We can conclude though that the rate billed the customer is much lower than the rate called for in the tariff.



RESULTS OF COMPARISON OF COMPANY CALCULATED AVERAGE AND ACTUAL TARIFF WITH THE COMPANY DETAIL OF EACH TYPE OF CALL THAT COULD BE MADE WITHIN THE STATE OF FLORIDA.

The company provided us with a disk which included a table of each type of call the Transcend customer can make. As explained by the company the rates are based on the tariff from the LEC. The table starts with the area code and first three digits and gives alternative methods that can be used for making and completing a call and the tariff for each call.

The company explained that there are many different rates that can be put together to make up a call. For example, local transport can be usef the call can go through a tandem or the call can be dedicated among others.

Staff compared the average reduction calculated by the company with different tariffs on the data

Dinuoices.

ONFIDENTA wap2 000237

WORLDCOM

TITLE:

ANALYSIS OF TRANSCEND ELEMENT

PERIOD: DATE: REDUCTIONS JANUARY 5, 2000

AUDITOR:

RKY

WP NO.

wp52-2

Results of comparing actual bills to the average tariff calculated by the company to determine if the amount billed the customers was the reduced amount.

We were provided with invoices for two customers for the months of September and November 98 as requested. These are invoices and 450733. A review of the invoices shows that there is not enough data to determine the rate per minute to the customer. We need detail to determine what rate per minute the customer was billed to compare with the rate schedule sent to us on disk for the months of September and November 98 and the company calculated average rate per minute for those two months on WP 52-2/2 and 52-2/8.

Request 13 requests this data again. If we cannot do this, we cannot determine if the customer was actually billed the reduction.

The company replied verbally of 2/4/00. There was no nettoned right new to determine the rote parminute

CONT 52-2 ρ³ 000238

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TAB I "

MCI-WorldCom Wholesale Marketing Pricing

100/25/00

Florida PSC Audit
Rate Reduction Analysis

GTE
Tariff Reduction

Sprint
Tariff Reduction

LTDB Reduction

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MCI WorldCom Wholesale Marketing **Pricing** Florida PSC Audit Rate Reduction Analysis InterLATA InterLATA InterLATA InterLATA InterLATA IntraLATA IntraLATA InterLATA IntraLATA IntraLATA IntraLATA Orig OCN Call Type Term Term Term Orig Name Orig Orig 09/98 11/98 Term Term Difference 09/98 11/98 Difference 09/98 11/98 Difference 09/98 GTE FLORIDA- INC. 11/98 GTE FLORIDA- INC. SPRINT/UNITED TELEPH SPRINT/UNITED TELEPH Per Company Too meny factors to get to an actual rute so prepared on average to show rates 800 often person gets kill.
There are different across rates for different part of the meters. Determe Originales pate from billes data on 9/98 + determe some them J "/98 -Determen the reduction (difference) Congrue The reduction to The LEC reduction. 00 N 4 Michael Green 12/22/99 1 of 1

Oct Analysis.xis AVG LTDB Reductions

IntraLATA

Term

Difference

MCFWorldCom TAB 2 Wholesale Marketing 1/25/00 Tariff Chang **Pricing** Florida PSC Audit **Rate Reduction Analysis: Tariff Change GTE Florida** Effective: 10/01/97 07/01/98 10/01/98 Orig Term Orig Term Orig Term **Local Transport Tandem Switching Facility** Termination RICRESIALDS **Local Switching Local Switching** Info Surcharge **Equal Access** Carrier Common Line Carrier Common Line Estimated CPM w/ 17 miles Reduction **Percent Sprint United Effective:** 10/01/97 07/01/98 10/01/98 Orig Term Orig Term Orig Term **Local Transport** Tandem Switching **Facility** Termination RIC **Local Switching Local Switching Carrier Common Line Carrier Common Line** Estimated CPM w/ 17 miles Reduction **Percent** V = agreed w tarth from GTE 52-2 X = Grees w/ tarth from LEC Sprew 52-2 Prepared by: Michael Green Oct Analysis.xis 12/22/99 1 of 1 Tariff Change

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GTE FLORIDA INCORPORATED

FACILITIES FOR INTRASTATE ACCESS

Third Revised Page 7 Cancelling Second Revised Page 7

3. CARRIER COMMON LINE SERVICE (Continued)

3.5 Rates and Charges

, The rate for Carrier Common Line service is:

Per Otiginating Access Minute ,0224842 Per Terminating Access Minute .0348342



(R) (R)

- 3.6 (Reserved for Future Use)
- 3.7 (Reserved for Future Use)
- 3.8 (Reserved for Future Use)

CONFIDENTIAL

EFFECTIVE: October 1, 1997 ISSUED: July 29, 1997

52-2 491,2+3

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PETER A. DAKS, PRESIDENT TAMPA, FLORIDA

GTE FLORIBA INCORPORATED

FACILITIES POR INTRASTATE ACCESS

Ĩ**3.** CARRIER CONSON LINE SERVICE (CONCIDENT)

3.6

3.7 (Reserved for Future Use)

PETER A. DAKE, PRESIDENT TAPPA, FLORIDA

EFFECTIVE: July 1, 1998



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(Reserved for Future Use)

PETER A. DAKS, PRESIDENT TAMPA, FLORIDA

October 1, 1998

Ø 005 ____

ACCESS SERVICE TARIFF

SPRINT-PLORIDA, INCORPORATED By: F. B. Poag, Director

First Revised Page 135 Cancels Original Page 135

Effective: October 1, 1997

E6. SWITCHED ACCESS SERVICE

E6.8 Rates and Charges

E6.8.1 Interconnection Charge

(D)

(D) + (C)

Rate \$0.010016

E6.6.2 Switched Transport

A. Entrance Facility

- Per Access Minute

		Monthly Rate	Nonrecurring Charge
1.	Voice Grade - Four Wire	\$ 80.00	\$144.00
2.	DS1 - Zone 1 - Zone 2 - Zone 3	\$189.00 \$210.00 \$220.50	\$360.00 \$360.00 \$360.00
3.	DS3 - Per DS3	Monthly Rate Within 0-3	Over 3 Nonrecurring

	MC	DEDIV RALE	3	
	Within	0-3	Over 3	Nonrecurring
	<u>Ç</u> Q	Miles	Miles	Charge
Zone 1	\$832	\$1,463	\$2,577	\$366
Zone 2	924	1,626	2,863	366
Zone 3	970	1,707	3,006	366

CONFIDENTIAL

50-2

ACCESS SERVICE TARIFF

SPRINT-FLORIDA, INCORPORATED By: F. B. Poag, Director Second Revised Page 135 Cancels First Page 135

Effective: July 1, 1998

E6. SWITCHED ACCESS SERVICE

E6.8 Rates and Charges

E6.8.1 Interconnection Charge

- Per Access Minute

\$0.007066 (J)-D

(R)

E6.8.2 Switched Transport

A. Entrance Facility

		HOHEHIT RIFE	MONTHEDEFFING CHARGE
1.	Voice Grade		
	- Four Wire	\$ 80.00	\$144.00

2. DS1
- Zone 1 \$189.00 \$360.00
- Zone 2 \$210.00 \$360.00
- Zone 3 \$220.50 \$360.00

3. DS3 - Per DS3

	Mc	inthly Rat		
	Within	Mile:	Over 3 Miles	Nonrecurring Charge
Zone 1	\$832	\$1,463	\$2,577	\$366
Zone 2	924	1,626	2,863	366
Zone 3	970	1,707	3,006	366

01/05/99 09:52 FAX 918 590 0764

PRICING ...

2007

ACCESS SERVICE TARIFF

SPRINT-FLORIDA, INCORPORATED By: F. B. Poag, Director

Third Revised Page 135 Cancels Second Page 135

Effective: October 1, 1998

E6. SWITCHED ACCESS SERVICE

E6.8 Rates and Charges

E6.8.1 Interconnection Charge

- Per Access Minute

Rate 80.001512

(R)

E6.8.2 Switched Transport

A. Entrance Facility

		Monthly Rate	Nonrecurring Charge
1.	Voice Grade - Four Wire	\$ 80.00	\$144.00
2.	DS1 - Zone 1 - Zone 2 - Zone 3	\$189.00 \$210.00 \$220.50	\$360.00 \$360.00 \$360.00

3. DS3 - Per DS3

	•		nthly Rat	. .	
		Within	Miles	Over 3 Miles	Nonrecurring Charge
Zone	1	\$832	\$1,463	\$2,577	\$366
Zone	2	924	1,626	2,863	366
Zone	3	970	1,707	3,006	366

52-2 5p3 000247 CONFIDENTIAL





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

VIA FACSIMILE

February 3, 2000

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

RE: WorldCom Request 13

Dear Ms. Young:

The following information is being provided pursuant to the above mentioned request. Your specific request for WNS Transcend asks for copies of the tariffs filed with the Commission for Transcend for the tariff prior to July 1, the July 1, and October 1, 1998 reductions, and the tariffs subsequent to October 1, 1998. As we discussed, Transcend is a carrier service provided via contract only. Pursuant to Rule 25-24.485 (1)(a) WorldCom is not required to file carrier to carrier contract arrangements. Thus, no tariff pages exist for this service.

The information provided may contain confidential information as defined in 364.183, 366.093, or 367.156 F.S.

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

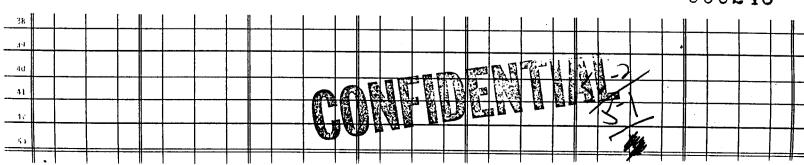
Sincercly,

Jyllig L. Davis

Begulatory Manager

hie L. Davido

53-3



W 5/00



December 28, 1999

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

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

TRANSCEND

RE: Follow up response for Requests Nos. 10 and 12 for WNS Transcend

Dear Ms. Young:

Enclosed please find a disk containing summary data from the LEC Tariff Database [LTDB]. The information on this disk is a Zip document housed in Microsoft Excel. The document contains five (5) tabs. Tab 1 is titled "Analysis" and contains a comparison of the actual GTE and Sprint tariff reductions and the LTDB reductions. Tab 2 is titled "Tariff Change" and contains a comparison of the actual rate elements making up switched access. Tab 3 is titled "AVG LTDB Reductions" and contains a comparison of the switched access rate changes for the two months requested from billing (i.e., September 1998 and November 1998). Tabs 4 and 5 are titled FL 0998 and FL 1198, respectively. These two tabs contain a summary of FL customers. Under the column entitled OCN, if you locate the OCN code and you will see that the originating and terminating rates match those shown on the Analysis sheet. The other OCN codes are for various other LECs in the state that did not have an access reduction.

As background explanation, the LTDB contains all rate components that are used to calculate switched access. These rate elements are pulled directly from the LEC switched access tariffs. Transcend is a wholesale product and most wholesale products have a flat postalized (i.e., non-distance sensitive) per minute rate. To meet the customers' requests for a more competitive product, WorldCom designed the Transcend product. The LTDB establishes the cost bases for calculating our customer's wholesale rate.

Please note that all information contained in this letter and on the enclosed disk is highly confidential.

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

Sincerely,

Julie L. Davis

Regulatory Manager

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120/12/00



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

November 3, 1999

Ms. Ruth Young
Florida Public Service Commission
3625 NW 82nd Avenue
Suite 400
Miami, FL 33166

Dear Ruth:

In response to Audit Request #10, we will only provide the generic contract for the "Transcend" product. We believe this meets your needs and allows us to maintain the necessary confidentiality of very sensitive information.

Sincerely,

Brian K. Sulmonetti

Director

BS:fj

Enclosure(s)

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WORLDCOM

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

November 23, 1999

In into

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

RE: Request 12 - Follow Up to 10 for WorldCom

Dear Ms. Welch:

This letter is in response to the above-mentioned request. As stated in that request, the information provided for the response for Request 10 was insufficient to document the amount reduced for the WNS Transcend rate element on the October 1, 1998 IXC flow through worksheet. The request for the additional information submitted by Ruth Young has been relayed to the appropriate WorldCom business unit. The business unit is in the process of researching and gathering the requested information, but it will not be available by November 24, 1999. I will have a better idea of how much time will be required to pull this data shortly. I will follow up with you the week of November 29, 1999.

Should you have questions, please feel free to contact me at 800-759-3813.

Sincerely,

Julie L. Davis
Regulario

Regulatory Manager

no further response as I w/1/99 f

COMFIDENTIAL 000252

Letter to Ms. Young December 17, 1999

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

9. Account

10/98 - invoice included as Exhibit G

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

10. Account

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

WorldCom Technologies

I. Request No. 11

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

2. Requests 10 and 12

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

Classic

See Exhibit H

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

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

Sincerely,

Julie L. Davis

Regulatory Manager

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To up a Conference Call

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

8 1/31/2000

TO: AND	IT HANAGER DATE:
	FED RECORD OR DOCUMENTATION:
	HAS BIEN PROVIDED TODAY
(2)	
(3)	AND IN MY OPINION. ITEM(S) IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED I 364.183. 366.083. OR 367.156. F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MEST. WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OR 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)
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Commissioners:
JOE GARCIA, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
E. LEON JACOBS, JR.



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

Bublic Service Commission

January 28, 2000

VIA FACSIMILE

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

Re: WorldCom Access Charge Flow Through Audit

Dear Ms. Davis:

In order to complete our audit, we need to follow-up on prior document requests 10, 10A and 12. This will be document request 13.

As you know, we could not determine a rate per minute from the invoices that were sent to us as part of the sample. We discussed this and you sent us detail for Account for the months of August 1998 and July 1999. We need to know how to translate this data into a rate per minute in order to agree to the July 1, 1998, and October 1, 1998, tariff. The tariff shows that this service is separated into four elements. They are Switched Service Peak, Switched Service Off-Peak, Dedicated Access Peak and Dedicated Access Off-Peak.

We also received detail for Account the second for the month of July 1999. This was not part of our sample and it doesn't appear on the Classic Carrier list of customers. Please explain why this was sent.

We were provided with invoices for two customers for the months of September and November 1998 as requested. These are invoices and invoices and invoices and invoices to the invoices, there does not appear to be enough data to determine the rate per minute to the customer. If there is a method, please let me know. If not, we need detail so that we can determine what rate per minute the customer was billed to compare with

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

An Affirmative Action/Equal Opportunity Employee

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

(2)-3 (2)-3 Ms. Julie Davis Page two January 28, 2000

the rate schedule sent to us on disk for the months of September and November 98. Also, please send us the tariffs filed with the Commission for Transcend for the tariff prior to July 1, the July 1 and October 1, 1998 reductions, and the tariff subsequent to October 1, 1998.

You mentioned you would be out of the office next week on Monday through Wednesday. As we need to complete this audit by February 8, we need this information by February 3 the latest.

Yours truly,

Ruth K. Young

Professional Accounting Specialist

ce: Brian Sulmonetti, MCI WorldCom Denise Vandiver, FPSC

Kathy Welch, FPSC

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MCI WORLDCOM REG AFFAIRS

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MCIWORLDCOM

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VIA FACSIMILE

Law & Public Policy 5ix Concourse Parkway Suite 3200 Atlanta, GA 30328

BBC

January 27, 2000

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

RE: WorldCom Requests

Dear Ms. Young:

Following please find the following tariff pages per your request:

TTI National Combined Business Calling Plan Service 1st Revised Sheet 25.1 effective 11/13/96;

TTI National Combined Business Calling Plan Service Original Sheet 25.2 effective 11/13/96;

Biz-Tel BUS 17 3rd Revised Sheet 23.1 effective 10/1/96; and WorldCom Network Services, Inc. Classic Carrier Service 8th Revised Sheet 150 effective 4/11/98. Classic Carrier Service was formerly known as WilMax Universal Carrier Service [Section 4.6.16]. The 8th Revised sheet following has (D) symbols on the page indicating a deletion or change of the company's name. Those pages should be available, but are stored off-site. I will try to locate the page prior to April 11, 1998 for your records. I should be able to provide it by February 4, 2000.

In reference to your question concerning Transcend invoices the following customers and invoice numbers subscribe to Transcend service:

invoices bices ...ô

slie L. Dans

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

Sincerely,

Julie L. Davis

Regulatory Manager

CONFIDENTIAL

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WORLDCOM TECHNOLOGIES

TITLE:

SAMPLE OF CLASSIC CARRIER RATE ELEMENT

PERIOD: DATE:

JANUARY 26, 2000

AUDITOR:

RKY

WP NO.

52-3

In order to test whether the customer was billed the reduced tariff for classic carrier service, invoices for the months of September and November 98 were selected. September to determine if the July 1, 1998 flow thru went into effect and November 98 to determine if the October 1, 1998 flow thru went into effect.

52-3

We selected accustomers, for a total of an invoices. We received the following as a response. Out of the 62, the company said there was no Florida traffic and did not provide us with the bills at they are large and long to print out for 26 invoices. They also stated that they were unable to print 2 invoices. We ended up with 34 invoices.

When the invoices were reviewed to determine if the reduction went into effect, we found out that the invoices for this particular service did not have enough information to recalculate the Intrastate, interlata and intralata calls. These invoices summarize the data by originating LATA, originating area code, and/ or by terminating area code and terminating LATA. There is no data that shows the detail of originating and terminating calls. Even if the company supplied all the invoices, we would not be able to test if the reduction went to the customer.

Discussions with the company indicated that the detail reports for the accounts we selected for Sept and November 98 were archived and it would take months to go through the tapes. The company determined that the information for July 99 through November 99 was available for the accounts we selected that had Florida traffic.

4.3 3

The company then supplied us with a summary of interlata and intralata calls for four classic carrier accounts. WP 52-3/3. For two accounts the summary said there was no applicable usage and the other two did not have enough information to determine that rate per minutes. This is because the tariff is both dedicated and switched. The information provided it is not detailed by dedicated and switched. Therefore, we could not divide the total dollars by the minutes to determine the rate per minute.

The company then said she was going to try to get the detail for July 99 which she thought the company had!

We were supplied with detail for two accounts for July 99. One account was selected as part of our sample, one was not. Another review of the data sent to us determined that we had detail one the one account in our sample for the month of August 98. These are called billed on the Sept 98 invoice we requested. Therefore, we have detail for one account for invoices sent out in Sept 98 and July 99.

This detail is on WP 52/3/3-2, 52-3/3-3 and 52-3/3-31 The detail needs to be compared with the tariff in effect in August 98 and July 99. The August 98 tariff is on WP 52-3/3-7.

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WORLDCOM TECHNOLOGIES

TITLE:

SAMPLE OF CLASSIC CARRIER RATE ELEMENT

PERIOD:

DATE:

JANUARY 26, 2000

AUDITOR:

RKY

WP NO.

52-3

However, we could still not determine a rate per minute from the detail to agree with the tariff. Request 13 requested this information. If we cannot determine a rate per minute, we cannot tell if the company actually billed the customer the reduction. WP 52-3/6.

The company's verbal response to Request No 13 on 2/4/00 is that the "Classic Carrier Service" is a carrier to carrier service and most carrier are on a special contract arrangement. This means that they are sometimes billed a lower rate than the tariff so it is difficult to determine the rate per minute from the detail of the invoices to a ree with the tariff.

Staff's analysis of the detail follows:

July 99(WP 53-3/3-1/1

+ terminating Calls

An average of 46 averages shows a rate per minute of the state of the taniff filed wit the Commission for October 1, 1998 on 53-3/3-7/ There is not enough detail. The detail could be switched, dedicated, interlata, intralata and or special contracts. We cannot tell from the information provided. The company could not get us any more detail.

August 98 WP 53-3/3-3

An average shows per minute. The tariff is .1008 for switched and .0604 for dedicated as of July 1, 1998. There is not enough detail to tell the actual rate per minute billed to the customer. Same as above.

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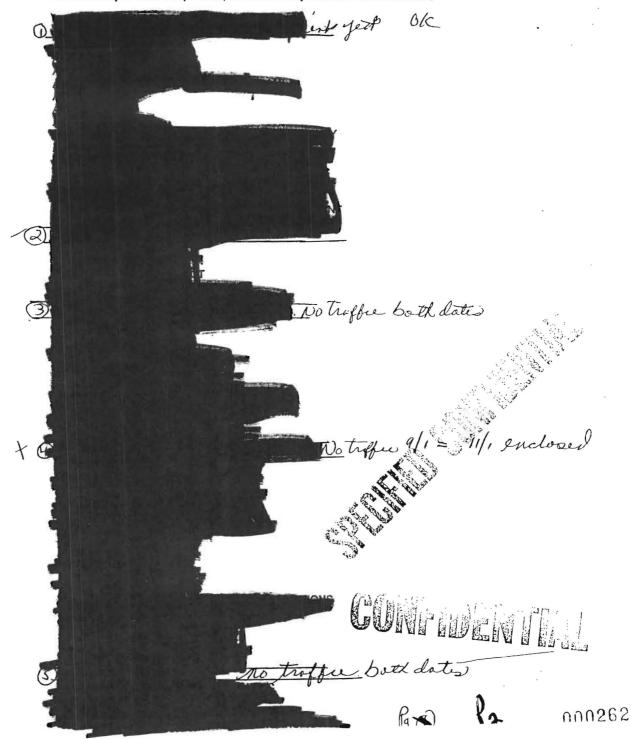
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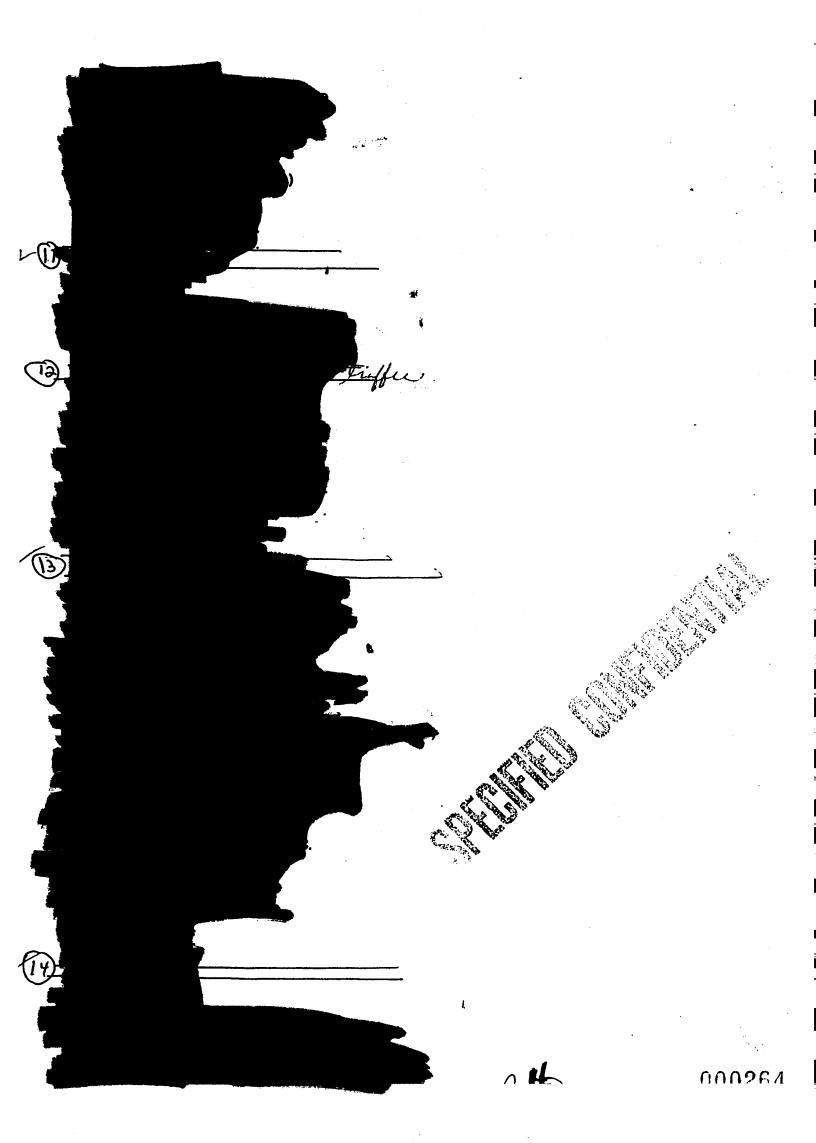
FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

TO: Brian Inmitte
FROM: (AUDITOR PREPARING REQUEST)
REQUEST NUMBER: DATE OF REQUEST: 10/1/99 AUDIT PURPOSE:
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY:
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
ITEM DESCRIPTION:
Provide bills for Dent + Nov 98
for each of the underland 31 customers)
M.
((lassic larries)
world com
TO: AUDIT MANAGER DATE:
THE REQUESTED RECORD OR DOCUMENTATION:
(1)
(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)
DISTRIBUTION: White: Utility Complete and Return to Auditor Pink: Audit File Copy Canary: Utility Retain 000261
Canary: Utility Retain 000261

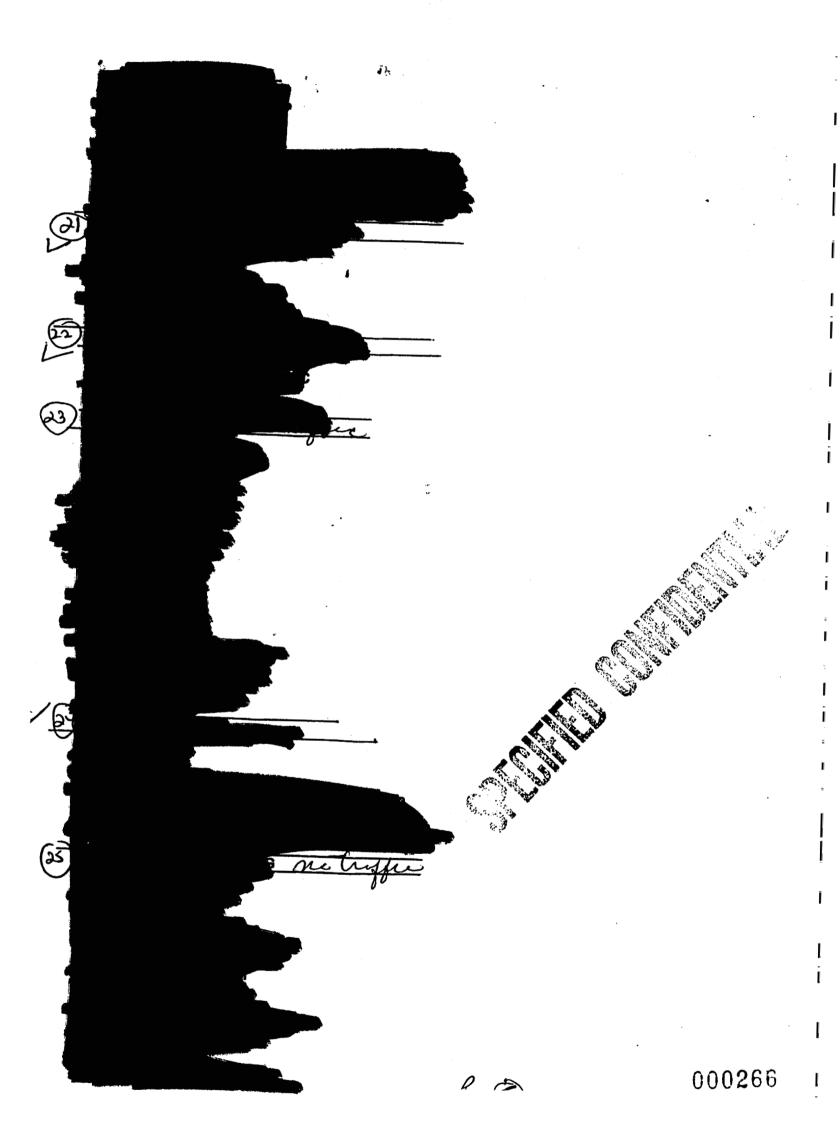
MCI WorldCom Wholesale Customers Classic Customer Account List 08/30/99

customers may be listed multiple times, this occurs if they have more than one account

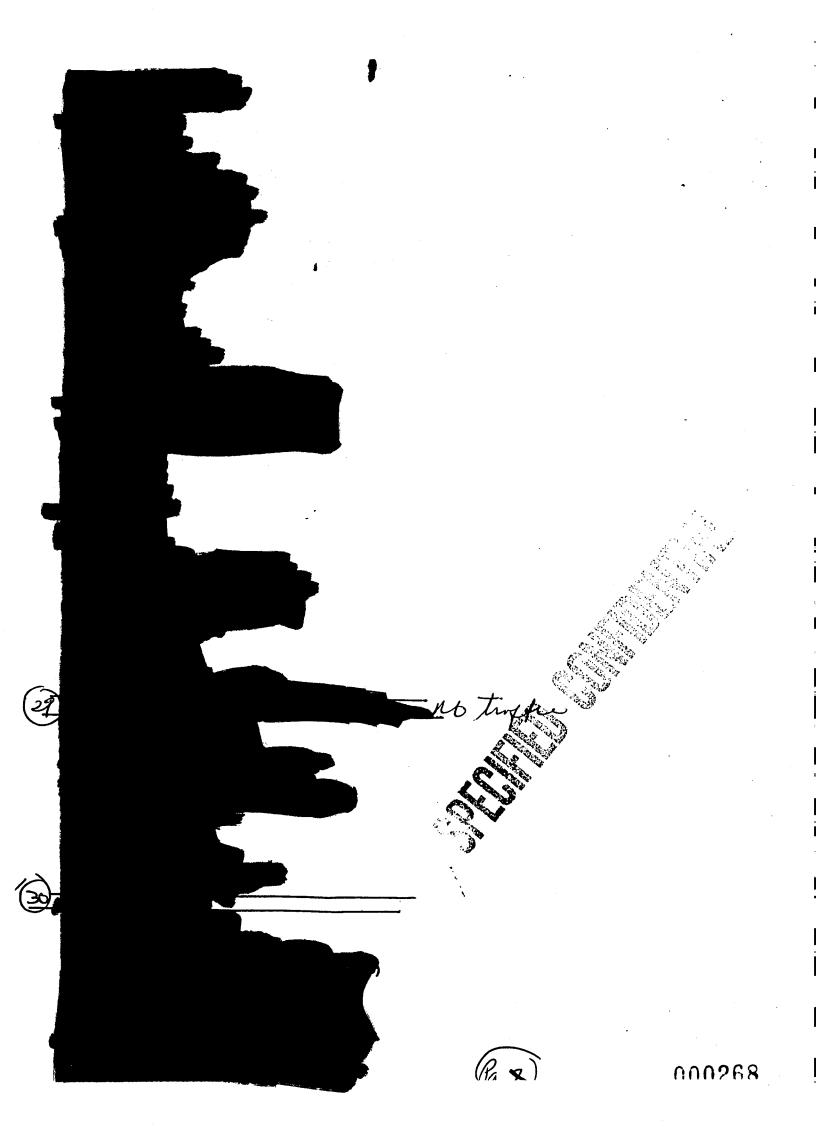


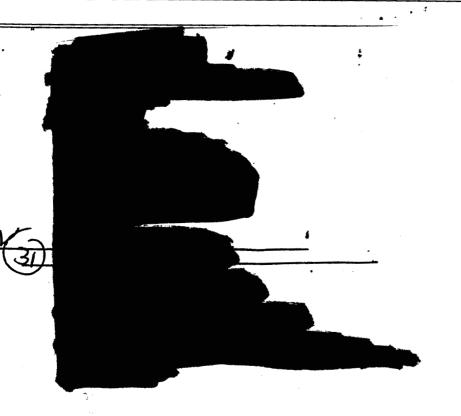


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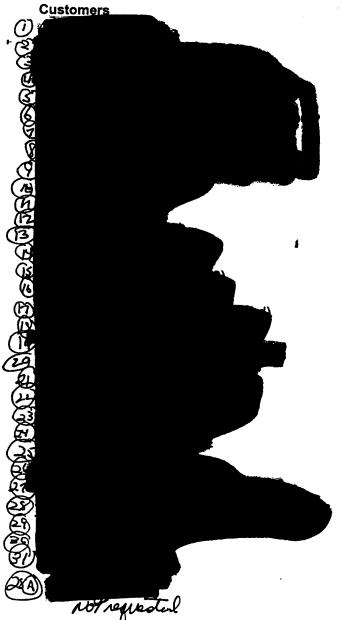


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Florida Regulatory Invoices



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COMPANY:

WORLDCOM TECHNOLOGIES

TITLE:

SAMPLE OF CLASSIC CARRIER RATE ELEMENT

PERIOD:

DATE:

JANUARY 26, 2000

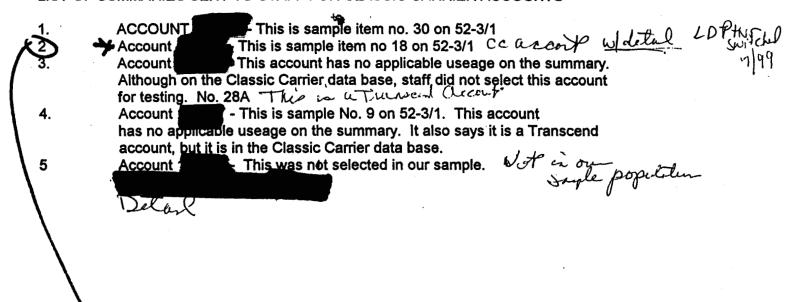
AUDITOR:

RKY

WP NO.

52-3

LIST OF SUMMARIES SENT TO STAFF FOR CLASSIC CARRIER ACCOUNTS

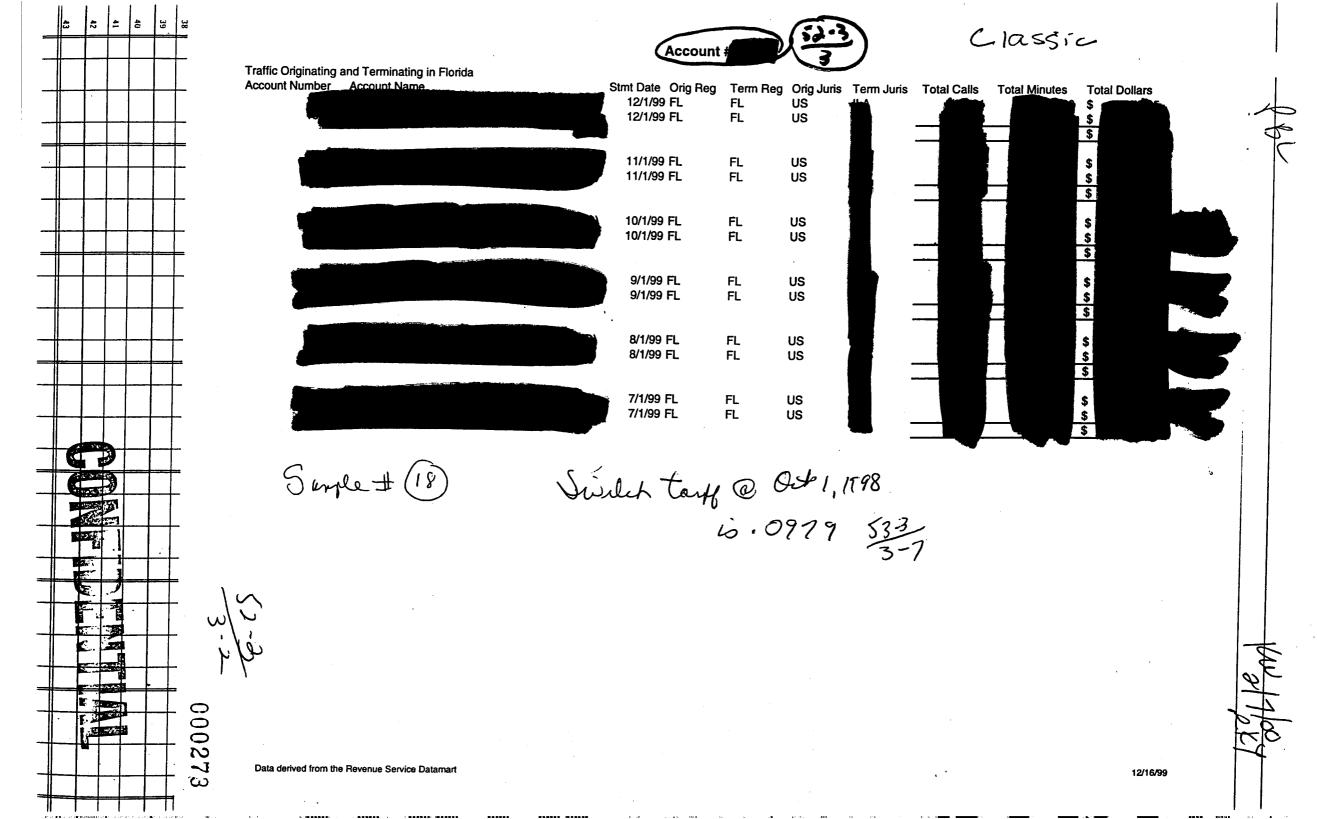


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julie I. davis

From:

Jones, Candy [candy.jones@wcom.com] Thursday, December 16, 1999 11:20 AM

Sent: To:

Davis, Julie L.

Subject:

Florida Query



Julie,

Attached is the data for account invoice). Please let me know if you need anything else.

Kugust 1998 usage (9/1/98

1

Candy

----Original Message-----

From: Anthony, James Sent: Thursday, December 16, 1999 10:08 AM

To: Jones, Candy Subject: Your query Custom Custom

Please find the attached .xls with your query.

James



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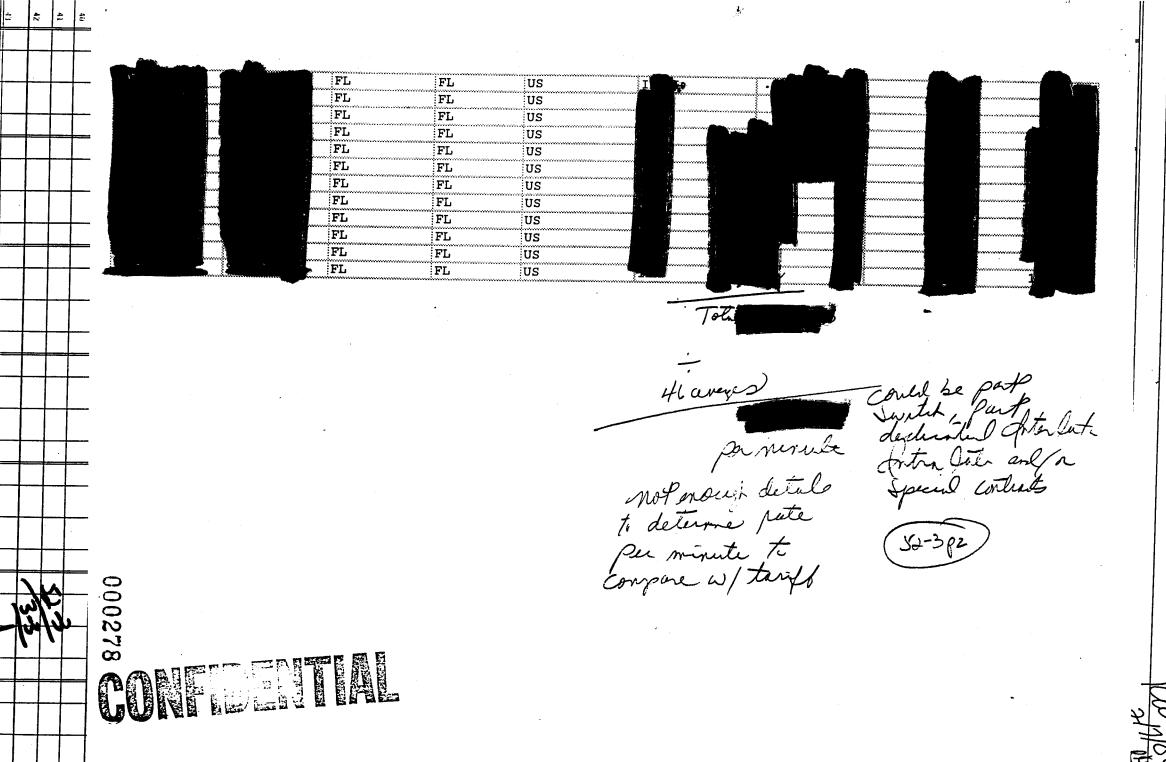
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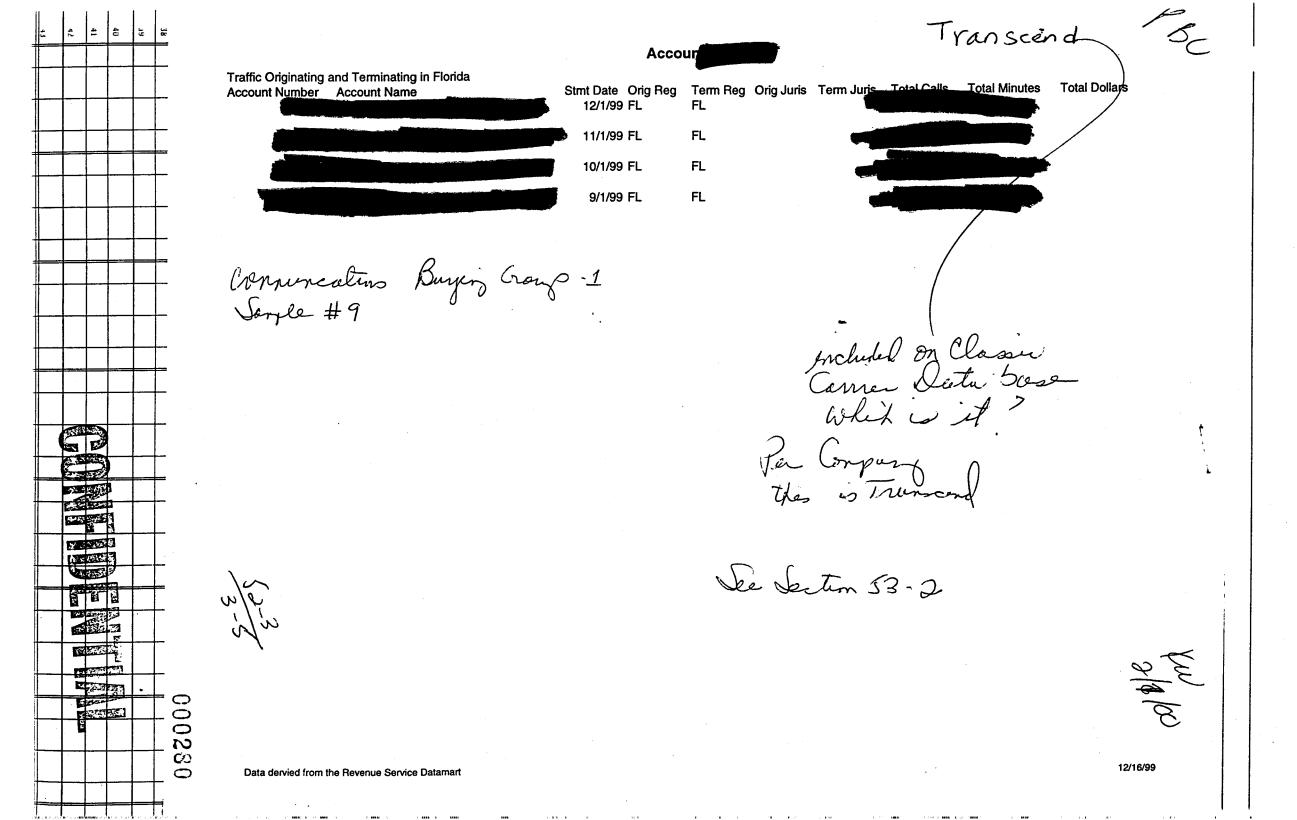
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WORLDCOM TECHNOLOGIES

CHANGES IN TARIFFS

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PRIOR TO AND AFTER JULY AND OCTOBER RAT

REDUCTIONS

JANUARY 25, 2000

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	1st Revised 2nd Revised
	Sheet 25.2 Sheet 25.2
	March 19, 1998 October 1, 1998
Plan B - Switched Access	
Service-Usage Sensitive	

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MCI WORLDCOM

POC

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

January 5, 2000

Corresp. W Corpany

CONFIDENTIAL

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

RE: Follow Up Response for Classic

Dear Ms. Young:

Enclosed please find information to support Classic customer accounts and for the month of 7/1/99. This information is the call detail record for the information provided as Exhibit H in the December 17, 1999 package.

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

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

Sincerely,

/Julie L. Davis

Regulatory Manager

CONFIDENTIAL

Letter to Ms. Young December 17, 1999

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

9. Account

10/98 \invoice included as Exhibit G

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

10. Account

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

WorldCom Technologies

Request No. 11

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

2. Requests 10 and 12

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

3. Classic

See Exhibit H

The unswer

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

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

Sincerely,

Juli∉ L. Davis

Regulatory Manager

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Letter to Ms. Young December 17, 1999 Page 2

2. Account

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

3. Account

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

4. Account

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

Account 5.

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

Account 6.

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

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

Account 7.

Same as No. 2 above.

8. Account

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

000287

Part 3



December 17, 1999

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

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

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

Dear Ms. Young:

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

MCI WorldCom

1. Answer to request No. 13.

Note A - Account

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

Notes B and C - Account

The calls in question are:

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



Letter to Ms. Young December 17, 1999 Page 2

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

Note D and E - Account

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

March 12, 1998 call

6:58 - 6:59 = 2 minutes x \$.25 = \$.50 7:00 - 7:18 = 19 minutes x \$.16 = \$3.04 Total call = 21 minutes = \$3\54

April 26, 1999 call

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

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

2. Answer to Request No. 14

1. Account No.

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







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

November 11, 1999

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

RE: WorldCom's 7/1/98 and 10/1/98 Flow Through Audit

Dear Ms. Young:

On November 9, 1999, MCI WorldCom forwarded you selected invoices from September and November of 1998. As noted in that package there were two customers whose invoices were not included. Enclosed please find the missing invoices for

enclosed is an example of a Transcend invoice for these time periods.

Additionally, in regards to Request 8 for MCI, enclosed please find the April 1998 and May 1999 invoices for the 25 customers selected.

MCI WorldCom considers the enclosed information to be confidential and appreciates your treatment as such.

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

Sincerely,

received met

Unlie L. Davis

Regulatory Manager

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Enclosures

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MCI WORLDCOM

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

November 9, 1999

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

RE: WorldCom's 7/1/98 and 10/1/98 Flow Through Audit

Dear Ms. Young:

Enclosed please find the September 1998 and November 1999 invoices for those WorldCom customers previously selected. Assummary list is also included identifying those invoices included in this package. Please note that two customer's invoices could not be printed at this time. Those customers are

Ve will forward these

invoices as soon as they can be printed.

L Davi

In addition, we are also working to pull an example of a Transcend invoice for these time periods.

MCI WorldCom considers the enclosed information to be confidential and appreciates your treatment as such.

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

Sincerely,

Julie L. Davis

Regulatory Manager

Enclosures

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

B1/31/2000

TO: The Wans	
UTILITY: World on	
FROM: (AUDIT MANAGER)	(AUDITOR PREPARING/REQUEST)
REQUEST NUMBER: 13	DATE OF REQUEST: 1/28/00
AUDIT PURPOSE: TXC Quels Char	y reduction
REQUEST THE FOLLOWING ITEM(S) BE PROV	IDED BY:
REFERENCE RULE 25-22.006, F.A.C., THI	S REQUEST IS MADE: INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
ITEM DESCRIPTION:	0A 412
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TO: AND T MANAGER	DATE:
THE REQUESTED RECORD OR DOCUMENTATION:	
(1) HAS BEEN PROVIDED TODAY	
(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT	WILL BE MADE AVAILABLE BY
(3) AND IN MY OPINION, ITEM(S) 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUMENT. WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, RECORDS AND REPORTING. REFER TO RULE 25-22.0	ROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN ED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF 106, F.A.C.
(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED	MEMORANDUM)
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White: Utility Complete and Return to Auditor
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Canary: Utility Retain



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



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

Public Service Commission

January 28, 2000

VIA FACSIMILE

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

Re: WorldCom Access Charge Flow Through Audit

Dear Ms. Davis:

In order to complete our audit, we need to follow-up on prior document requests 10, 10A and 12. This will be document request 13.

Classic Carrier Sample

As you know, we could not determine a rate per minute from the invoices that were sent to us as part of the sample. We discussed this and you sent us detail for Account for the months of August 1998 and July 1999. We need to know how to translate this data into a rate per minute in order to agree to the July 1, 1998, and October 1, 1998, tariff. The tariff shows that this service is separated into four elements. They are Switched Service Peak, Switched Service Off-Peak, Dedicated Access Peak and Dedicated Access Off-Peak.

We also received detail for Account the second to the count of July 1999. This was not part of our sample and it doesn't appear on the Classic Carrier list of customers. Please explain why this was sent.

WNS Transcend

We were provided with invoices for two customers for the months of September and November 1998 as requested. These are review of the invoices, there does not appear to be enough data to determine the rate per minute to the customer. If there is a method, please let me know. If not, we need detail so that we can determine what rate per minute the customer was billed to compare with

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

An Affirmative Action/Equal Opportunity Employee

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Ms. Julie Davis Page two January 28, 2000

the rate schedule sent to us on disk for the months of September and November 98. Also, please send us the tariffs filed with the Commission for Transcend for the tariff prior to July 1, the July 1 and October 1, 1998 reductions, and the tariff subsequent to October 1, 1998.

You mentioned you would be out of the office next week on Monday through Wednesday. As we need to complete this audit by February 8, we need this information by February 3 the latest.

Yours truly,

Ruth K. Young

Professional Accounting Specialist

cc: Brian Sulmonetti, MCI WorldCom L

Denise Vandiver, FPSC Kathy Welch, FPSC

CONTINUENCIAL

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AUDIT DISCLOSURE 1

SUBJECT:

TARIFF CHANGES

STATEMENT OF FACTS: Staff reviewed the tariffs from WorldCom that were in effect prior to the July 1, 1998 decrease to the present in order to determine if any of the tariffs that were decreased on the "Flow- Through Work Sheets" for access charge reductions were increased prior to the reduction and/or increased after the flow-through to the customers. The tariffs that were changed prior to the reductions and after the reductions are noted below.

WorldOne Service Dedicated and Switched

Tariffs submitted to the Commission show that there was an increase in this tariff on April 10, 1998 prior to the flow through reductions on July 1, and October 1, 1998. The PSC order requiring the first reduction was issued June 8, 1998. Also, this same tariff was increased effective May 18, 1999. Schedule 14 attached to this disclosure shows the increases and decreases. The April, July and October tariffs were never put into effect. The WorldOne Service customers were billed the October 1, 1996 tariff from October 1, 1996 through May 1999. Audit Disclosure 2 explains the details and the effect on the customers.

Biztel BUS 17

This rate element was not reduced in the July 1, 1998 reduction. This element was reduced on the October 1, 1998 Flow Through Work Sheet. Tariffs submitted to the Commission on May 13, 1998 showed an increase in the "all other times" rate prior to the October 1, 1998 reduction. Schedule 2 attached to this disclosure shows the increases and decreases.

CLASSIC CARRIER SERVICE

Tariffs submitted to the Commission show that there was a change in the tariff on April 12, 1998 prior to the flow through reductions on July 1 and October 1, 1998. Schedule 2 attached to this disclosure shows the increase and decreases.

NEED TO FIND OUT WHETHER THIS CHANGE WAS AN INCREASE OR DECREASE. WAITING FOR COMPANY ANSWER ON FEB 3.

The tarff before april 12, 1998 was dated Nov 26, 1997 y is the Same as april 12, 1998—

COMPANY: TITLE: PERIOD:

AUDITOR:

INTERLATA

WORLDCOM TECHNOLOGIES

CHANGES IN TARIFFS

PRIOR TO AND AFTER JULY AND OCTOBER RATE ' REDUCTIONS

JANUARY 25, 2000

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WP NO.

DATE:

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WORLD ONE SERVICE

12 Month ESP Out and In

24 Month ESP Out and In

FPSC Tariff No 4FPSC Tariff No 4FPSC Tariff No 4FPSC Tariff No 4FPSC Tariff No 4 3RD Revised 4th Revised 5th Revised 6th Revised 7th Revised Sheet 165 Sheet 165 Sheet 165 Sheet 165 Sheet 165 10/1/96 4/10/98 7/1/98 10/1/98 5/18/99 Switched Per Minute Monthly Outbound 0.1395 0.1376 0.1562 0.1464 0.1477 0.1630 0.1465 Monthly Inbound 0.1485 0.1559 0.1573 12 Month ESP Out and In 0.1350 0.1512 0.1418 0.1333 0.1430 24 Month ESP Out and In 0.1305 0.1462 0.1371 0.1289 0.1382 **Dedicated Per Minute** 0.1048 0.1047 0.0990 0.1139 0.1068 Monthly Outbound Monthly Inbound 0.1080 0.1242 0.1164 0.1141 0.1144

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CONFIDENTIAL

COMPANY:

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WORLDCOM TECHNOLOGIES

CHANGES IN TARIFFS

PRIOR TO AND AFTER JULY AND OCTOBER RAT

REDUCTIONS

JANUARY 25, 2000

RKY

17 SERVICE

3rd Revised

4TH Revised Sheet No. 23.1 Sheet No. 23.1

5th Revised

Sheet No. 23.1

October 1, 1996 May 13, 1998

October 1, 1998

DAY 7A.M. TO 7.P.M. **ALL OTHER TIMES**

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CLASSIC CARRIER SERVICE

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9th Revised Sheet 150

April 12, 1998

10th Revised Sheet 150

July 1, 1998

11th Revised Sheet 150

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Dedicated Access Peak **Dedicated Access Off-Pk**

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