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Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743
Attention: Office of the Secretary

RE: CC Docket No. 96-128; 2008 Audit Report and Letter of Attestation of Andiamo Telecom, LLC

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.1320(f), enclosed on behalf of Andiamo, Telecom LLC is the 2008 Management Report on Compliance with Applicable Requirements and Letter of Attestation by an Independent Third-Party Auditor concerning Andiamo's compliance with the Commission's Payphone Compensation Rules.

Pursuant to 47 C.F.R. §64.1320(e), following is the contact information for persons responsible for handling payphone compensation and for resolving disputes with payphone service providers.

Primary Contact: BSG Clearing Solutions, Inc.
Attention: Peggy Gaitan
7411 John Smith Drive, Suite 200
San Antonio, TX 78229
(210) 949-7109

Secondary Contact: Andiamo Telecom, LLC
Attention: Joseph M. Rao
10575 N. 114th Street, Suite 103
Scottsdale, AZ 85259
(602) 344-0115

In accordance with the Commission's rules, this Letter of Attestation and Management Report are being made available to each Payphone Service Provider for which Andiamo completes calls and with each facilities-based long distance carrier from which it receives payphone calls.

Please acknowledge receipt of this filing by returning a date stamped copy of the enclosed cover letter duplicate in the return self-addresses, stamped envelope that is provided for this purpose. Any questions regarding this filing may be addressed to the undersigned by calling (407) 740-3031 or via email at sthomas@tminc.com.

Sincerely,

Sharon Thomas, Consultant to
Andiamo Telecom, LLC

Enclosures

cc: R. Torraca
file: Andiamo - FCC
tms: FCCx0901

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List A B C D E

Melvyn D. Ohre CPA
Report of Independent Auditor
To the Management of Andiamo Telecom, LLC
Scottsdale, AZ 85259

In the matter of)
)
Conformance to the Pay Telephone)
Reclassification & Compensation Provisions of)
The Telecommunications Act of 1996)
FCC 03-235)

June 2008

Letter of Attestation

I have examined management's assertion, that it believes that, as of June 30, 2008 Andiamo Telecom's controls over its review methods, procedures and systems deployed for compliance with FCC Dial-Around Compensation (DAC requirements, are effective in providing reasonable assurance that FCC reporting requirements are properly followed, summarized and reported to Payphone Service Providers (PSP's). This assertion is included in the accompanying report by management titled, "Report of Management on Measurement and Reporting – June 2008". Andiamo Telecom's management is responsible for maintaining effective controls over its measurement and reporting function. My responsibility is to express an opinion on management's assertion based on my examination.

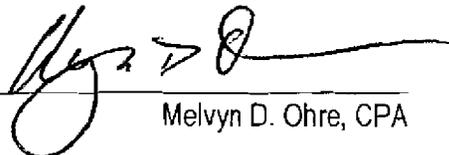
My examination was conducted in general accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and by implementing the Commission's recommended audit program used by MCI and, accordingly, included obtaining an understanding of the controls over review methods, procedures and systems deployed by management for compliance with FCC requirements, testing, and evaluating the design and operating effectiveness of those controls, and performing such other procedures as I considered necessary in the circumstances. I believe that my examination provides a reasonable basis for my opinion.

Because of inherent limitations in controls, errors or fraud may occur and not be detected. Also, projections of any evaluation of controls over the measurement and reporting function to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

In my opinion, management's assertion, that it believes that, as of June 30, 2008, Andiamo Telecom's controls over its measurement and reporting function as it related to review methods, procedures and systems deployed by management for compliance with FCC requirements are effective in providing reasonable assurance that FCC requirements are properly recorded, summarized and reported, is fairly stated, in all material respects, based on the criteria specified in management's report.

This report is intended for compliance purposes, and, as such, the information contained herein and its use is solely at the discretion of Andiamo Telecom's management.

By: _____



Melvyn D. Ohre, CPA

June 29, 2009

Scottsdale, AZ, USA

**Andiamo Telecom Management Report
On Compliance
With Applicable Requirements
Of the FCC's Rules and Regulations,
Section 64.1310(a)(1)
June 2008**

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I. INTRODUCTION & HISTORY

On September 30, 2003, the Federal Communications Commission (FCC) released its Report and Order in CC Docket No. 96128 (FCC 03-235) titled *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*. In this latest ruling, the FCC adopted new payphone compensation rules.

These rules place responsibility on the completing carrier to establish a call-tracking system and to compensate PSPs for coinless payphone-originated calls that are completed by that carrier. Carriers are required to establish call tracking systems, have an independent third-party auditor attest that the system accurately tracks payphone calls to completion, and pay PSPs directly, based on the carrier's own call tracking data. The FCC rules also define new reporting requirements for intermediate carriers, although no attestation is required.

The requirements set forth by the FCC take effect the first day of the first full quarter after the new rules became effective. These rules became effective July 1, 2004.

Andiamo Telecom, LLC

Andiamo Telecom is a leading facilities-based domestic and international carrier that provides a broad range of telecommunication services designed to meet the unique needs of customers worldwide, including prepaid calling cards, long distance for retail and wholesale customers, local phone service in Arizona and California, domestic and International Operator Services, and nationwide dial-up Internet services.

Andiamo's corporate offices are located in Scottsdale Arizona. It has a call center in San Luis Obispo, California and switch locations in Phoenix and Los Angeles.

Andiamo Telecom, LLC, was formed on February 10, 2004.

II. BACKGROUND

Prior to the new rules becoming effective, carriers were required to follow the rules as set forth in the FCC's previously issued Second Order on Reconsideration (CC Docket No. 96-128). For many carriers, current network and billing system processes and procedures implemented to comply with the Second Order of Reconsideration may already support compliance with portions of the FCC's latest ruling. However, when the new rules became effective, carriers were required to implement a more detailed level of data gathering, analysis, storage, and reporting, as well as monitor compliance with the new rules.

Each completing carrier will be required to file a report from the independent auditor regarding the completing carrier's compliance with the FCC's rules by the effective date of such rules. Consistent with standards established by the American Institute of Certified Public Accounts (AICPA) for attestation engagements, the System Audit Report shall consist of (1) the completing carrier's representation concerning its compliance and (2) the independent auditor's opinion concerning the completing carrier's representation of compliance.

This report must be filed with the FCC Commission's Secretary in CC Docket No 96-128 and with each PSP for which the completing carrier completes calls and with each facilities-based long distance carrier from which it receives payphone calls.

III. ANDIAMO MANAGEMENT SUMMARY – COMPLIANCE ATTESTATION

The management of Andiamo Telecom, LLC, is responsible for establishing and maintaining adequate systems and processes for its payphone call tracking system, and for ensuring Andiamo's compliance with the applicable requirements of Section 64.1310(a)(l) of the FCC Report and Order in CC Docket No. 96.128, released on October 3, 2003, regarding *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*.

Andiamo management has performed an evaluation of the company's compliance with the applicable requirements of CC Docket No. 96-128 using the criteria in 64.1320[c] as the framework for the evaluation. Based on this evaluation, I assert that, as of June 30, 2005 Andiamo complies with all applicable requirements of CC Docket No. 96-128.

I have prepared the required assertion statements relating to Andiamo's Payphone Call Tracking Systems.

Andiamo is acknowledged as the "Completing Carrier" in the following call scenarios:

- Call Type 1 (Completed by Andiamo) – Received via IXC's Global Crossing or Sprint
- Call Type 2 (Completed by Andiamo) – Received via PSP contract (ACA)

All assertions for Andiamo are from the point Andiamo has visibility to the call tracking data.

Andiamo has a signed contract with Billing Concepts Inc. of San Antonio, TX ("BCI") for payphone compensation settlement with PSP's. BCI is a nationally known payphone compensation.

Andiamo has obtained and relied upon third-party assurance from BCI to verify that controls and procedures relating to these assertions have been established and maintained by BCI. An independent assessment of the effectiveness of such controls has been performed by an independent accounting firm. (See Reports – EXH A)

Andiamo represents the following assertions, where Andiamo is identified as the Completing Carrier.

FCC compliance § 64.1320© Subsection (1) – *Whether the Completing Carrier's procedures accurately track calls to completion*

- Andiamo's definition of the "per-call rate" of \$0.494 is in compliance with current (as of June 2007) FCC rules.
- Andiamo's definition of a "Compensable Call" (payphone-originated call that completes over Andiamo's network in which Andiamo identifies itself as the Completing Carrier) is in compliance with the FCC rules.

Footnote: Billing Concepts Inc (BCI) is currently doing business as BSG Clearing Solutions

- Andiamo's definition of a "Completed Call" (call that is answered by the called party) is in compliance with the FCC rules,
- Andiamo's systems, or its contracted partner systems, are able to generate the following reports, on a monthly, quarterly, or on-demand, basis:
 - A list of the toll free and access numbers dialed, and completed, from each PSP's payphones, with the ANI for each payphone.
 - The volume of calls for each toll free, and access, number that was completed by Andiamo.
 - The names, addresses, and phone numbers of the persons responsible for handling Andiamo's payphone compensation.
 - The CIC code, or Trunk routing group, of all facilities based LD carriers that routed calls to Andiamo categorized according to toll-free and access code numbers.
- Andiamo's data storage requirement is in compliance with FCC rules except as noted in the details section following.
- Andiamo's procedures for identifying PSP's are complete and accurate except as noted in the details section.
- Andiamo's procedures for validating payphone ANIs are complete and accurate except as noted in the details section.

FCC compliance § 64.1320 [c] subsection (2) – *Whether the Completing Carrier has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls.*

- Andiamo has designated personnel responsible for drafting the business requirements associated with tracking, compensating, and resolving disputes concerning payphone-compensated calls except as noted in the details section.
- Andiamo has designated personnel responsible for the development and maintenance of systems used in the collection and reporting of payphone call data.
- Andiamo has designated personnel responsible for the implementation and maintenance of procedures that are utilized in creating final compensation data except as noted in the detail section.
- Andiamo has designated personnel who are responsible for developing compensation-tracking reports except as noted in the detail section.
- Andiamo has designated personnel who are responsible for developing compensation dispute resolution.

FCC compliance § 64.1320 [c] subsection (3) - *Whether the Completing Carrier has effective data monitoring procedures.*

- Andiamo has the ability to prepare monthly, quarterly, or ad hoc, reports on payphone call counts, PSP identities and numbers dialed except as noted in the details section.
- Andiamo performs data monitoring procedures on call record volumes entering the payphone compensation systems.
- Andiamo has the ability to produce trend reports of excluded calls.

- Andiamo performs fraud-monitoring procedures to identify potentially illegitimate payphones.
- Andiamo has the ability to investigate and resolve PSP disputes except as noted in the details section

FCC compliance § 64.1320[c] subsection (4) – *Whether the Completing Carrier adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability*

- Andiamo has documented security controls in place to control access to, and monitor, call-tracking data,
- Andiamo has documented security controls in place to control access to, and monitor, the payment disbursement system except as noted in the details section.
- Andiamo has a department responsible for making software changes that affect payphone compensation.
- Andiamo has established protocols to implement and test software changes affecting payphone compensation.
- Andiamo has application controls in place to ensure that network changes, external to payphone compensation, do not negatively impact payphone compensation.

FCC compliance § 64.1320[c] subsection (5) – *Whether the Completing Carrier has created a compensable payphone call file by matching call detail records against payphone identifiers.*

- Andiamo utilizes switch data and SQL to populate the date, originating ANI, dialed number, and aggregate data into a Compensable Call File.
- Andiamo uses payphone specific identifiers (info digits or ANI lists) to identify a compensable payphone call record.
- Andiamo applies validation and control procedures to compile the Compensable Call File.

FCC compliance § 64.1320[c] subsection (6) – *Whether the Completing Carrier has procedures to incorporate call data into required reports.*

- Andiamo's SQL systems, or its contracted partner systems, are able to generate the following reports on a quarterly basis:
 - A list of the toll free and access numbers dialed and completed from each PSP's payphones, along with the ANI for each payphone except as noted in the details section.
 - The volume of calls for each toll free and access number that was completed by Andiamo's switches.
 - The CIC code or Trunk routing group of all facilities based LD carriers that routed calls to Andiamo's switches categorized according to toll-free and access code numbers
- Andiamo possess a valid list of payphone owners identified by ANI except as noted in the details section.
- A system listing the names, addresses, and phone numbers of the person(s) responsible for handling payphone compensation except as noted in the details section.

FCC compliance § 64.1320[c] subsection (7) – *Whether the Completing Carrier has implemented procedures and controls needed to resolve payphone compensation disputes.*

- Andiamo maintains required call tracking data from the date of its inception, February 10, 2004, except as noted in the details section.
- Andiamo has the ability to investigate and resolve PSP disputes except as noted in the details section.
- Andiamo has designated personnel who are responsible for payphone compensation dispute resolution except as noted in the details section.

FCC compliance § 64.1320[c] subsection (8) – *Whether the independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial.*

- Andiamo has procedures to identify payphone-originated calls.
- Andiamo has procedures to capture dial-around calls.
- Andiamo has procedures to exclude incomplete calls from the compensable call file.
- Andiamo has procedures to accurately populate call record data in the compensable call file.
- Andiamo has procedures to exclude commissioned calls from the compensable call file.

FCC compliance § 64.1320[c] subsection (9) – *Whether the Completing Carriers has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:*

- i) *Identify calls which originated from payphones;*
 - ii) *Identify compensable payphone calls;*
 - iii) *Identify incomplete or otherwise non-compensable calls; and*
 - iv) *Determine the identities of the payphone service providers to which the Completing Carrier owes compensation.*
- Andiamo has business rules that identify calls originated from payphones.
 - Andiamo has business rules that identify compensable payphone calls.
 - Andiamo has business rules to determine the identities of the payphone service providers to which Andiamo owes compensation except as noted in the details section.

IV. SPECIFICS OF FCC COMPLIANCE

FCC Compliance Factor (1) – Andiamo’s procedures accurately track calls to completion.

- *Andiamo’s definition of the “per-call rate” of \$0.494 is in compliance with FCC rules.*
 - (See the Appendix – Definitions)
 - This information is subsequent to 47 CFR Part 64 [WC Docket No. 03-225; FCC 04-182] “Default Compensation Rate for Dial-Around Calls From Payphones Increased to \$0.494”
- *Andiamo’s definition of a “compensable call” (payphone-originated call that completes over Andiamo’s network in which Andiamo identifies itself as the Completing Carrier) is in compliance with the FCC rules,*
 - (See the Appendix – Definitions)
- *Andiamo’s definition of a “completed call” (call that is answered by the called party) is in compliance with the FCC rules,*
 - (See Appendix – Definitions)
- *Andiamo’s systems are able to generate the following reports on a quarterly, monthly, or ad hoc basis:*
 - *A list of the toll free and access numbers dialed and completed from each Payphone Service Provider’s (PSP’s) payphones along with the ANI for each payphone*
 - See reports EXH B
 - *The volume of calls for each toll free and access number that was completed by Andiamo.*
 - See Reports EXH C
 - *The name(s), address(es), and phone number(s) of the person(s) responsible for handling Andiamo’s payphone compensation.*
 - Andiamo has a contract with BCI to compensate PSPs for completed calls. BCI matches completed call records from Andiamo to its PSP database and issues compensation accordingly. In the event of a PSP-perceived discrepancy between the calls made from the PSP’s payphones and the calls compensated to the PSP by BCI, the Andiamo completed call records can be compared to the PSP’s records. Responsibility for this process at Andiamo rests with the Andiamo Chief Technology Officer.
Mr. Dimitris Pantartzis, CTO
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.346.0001
 - *The CIC code or Trunk routing group of all facilities based LD carriers that routed calls to Andiamo categorized according to toll-free and access code numbers.*
 - See reports EXH D
- *Andiamo’s data storage requirement (18 months) is in compliance with FCC rules.*
 - Andiamo maintains the following storage systems:
 - The Andiamo switches maintain records for 6 months as provided by the switch manufacturer standard operating procedures.

- All CDR switch data is backed up twice daily by Andiamo to separate computer servers in the Andiamo server farm;
- All CDR data is backed up weekly to dual-redundant DLT tape on an Andiamo-maintained DTL carousel;
- All "redundant copy" DLT tapes are maintained off premises
- Mirror image data backup is also burned to DVD or CD-ROM and maintained on and off premises
- Data is archived on DLT and DVD-ROM/CD-ROM for the entire time period since Andiamo's inception February 2004
- Andiamo procedures call for data to be archived indefinitely
- *Andiamo's procedures for identifying PSPs are complete and accurate.*
 - Andiamo can only identify calls originating from pay phones by their info-digits. The info-digits are sent with the IXC's call record. Andiamo also records the originating ANI. Andiamo cannot identify individual PSP's by name insofar as it does not have access to that information (ANI-Owner data base). However, BCI, the Andiamo clearinghouse, does have detailed PSP information, and is able to identify individual PSPs from its records and the call records provided to BCI by Andiamo.
- *Andiamo's procedures for validating payphone ANIs are complete and accurate.*
 - The info-digits are the only means Andiamo has for validating that an originating number is a payphone. Since the actual compensation procedure is based on the merger of the PSP identities to the payphone ANI's, which is done by BCI, given accurate info-digits and BCI's already audited procedures for validating payphone ANI's to its base of PSP's, Andiamo believes the process results in complete and accurate information.

FCC Compliance Factor (2) – Persons responsible for tracking, compensating, and resolving disputes concerning payphone-completed calls.

- *Andiamo has designated personnel responsible for drafting the business requirements associated with tracking, compensating, and resolving disputes concerning payphone-compensated calls.*
 - Andiamo has a contract with BCI to compensate PSP's for completed calls. BCI matches completed call records from Andiamo to its PSP database and issues compensation accordingly. In the event of a PSP-perceived discrepancy between the calls made from the PSP's payphones and the calls compensated to the PSP by BCI, the Andiamo completed call records reports can be compared to the PSP's records. (See Reports EXH E). Responsibility for this process at Andiamo rests with the Andiamo Chief Technology Officer.
Mr. Dimitris Pantartzis, COO
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.346.0001
- *Andiamo has designated personnel responsible for the development and maintenance of systems used in the collection and reporting of payphone call data.*
 - These Andiamo systems are maintained by the Andiamo Director of Engineering

Mr. Kevin Owens, Switch Operations Manager
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.3416.0001

- *Andiamo has designated personnel responsible for the implementation and maintenance of procedures that are utilized in creating final compensation data sets.*
 - These Andiamo systems are maintained by the Andiamo Director of Engineering
Mr. Kevin Owens, Switch Operations Manager
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.346.0001
- *Andiamo has designated personnel responsible who are responsible for developing compensation-tracking reports.*
 - Andiamo has contracted with BCI to provide PSP compensation. BCI produces compensation tracking reports, which are available to Andiamo. Because Andiamo does not have access to PSP identities other than ANI's, which indicate only that a phone is a payphone, the BCI reports are the only accurate reports. BCI has been independently audited and its reporting and procedures have been found to be valid.
 - Andiamo produces financial reports allowing it to compare BCI's reports of compensation to payphone operators to its own information. See Reports EXH E.
- *Andiamo has designated personnel who are responsible for payphone compensation dispute resolution.*
 - As noted, Andiamo has a contract with BCI for payphone compensation handling. However, in the event of a dispute, which extends beyond BCI's available information and back to Andiamo's call records, responsibility for this process at Andiamo rests with the Andiamo Chief Technology Officer.
Mr. Dimitris Pantzartzis, CTO
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.346.0001

FCC Compliance Factor (3) – Effective data monitoring procedures.

- *Andiamo has the ability to prepare quarterly reports on payphone call counts, PSP identities and numbers dialed.*
 - Andiamo is able to produce ad hoc, or scheduled, reports on payphone call counts, both completed and incomplete. It is also able to produce ad hoc reports on the numbers called. However, Andiamo is unable to identify individual PSPs as it does not have access to that information. BCI is able to produce this report.
 - See Reports EXH F.
- *Andiamo performs data monitoring procedures on call record volumes entering the payphone compensation systems.*

- See the plate titled DATA FLOW in the Appendix. Payphone, and all customer data records, are collected from the Andiamo switch system on a twice-daily basis (or more frequently if circumstances dictate). Payphone-specific data is output by the Andiamo switches in exactly the same way, and along with, other customer billable data is output. Payphone completed call data for compensation is separated from other customer data records at the Andiamo SQL server (data base engine) systems level. Data is then formatted, by the Andiamo SQL system, into a record format acceptable for electronic transmission to BCI. That record format is illustrated in the plates section of the Appendix. All DAC compensable payphone data, which comes from the Andiamo SQL process, and reformatting process, also generates reports as to volume and other statistics required by Andiamo for the normal operation of its business.
- *Andiamo has the ability to produce trend reports of excluded calls.*
 - The term “excluded calls” may have several definitions. They are addressed here.
 - “Excluded calls” might include call records which appear on the customer call records received by Andiamo from it’s contracted IXC’s but, do not appear on the Andiamo switch call records. It is important to understand that, if a call does not appear on the Andiamo switch customer call record data, then Andiamo has no way to collect revenue for that call. In fact, if a call is not recorded by the Andiamo switches, then it essentially “never existed” at Andiamo. On the other hand, by contract, if the IXC’s records show a call being handed to Andiamo, the IXC will then bill Andiamo for time used to complete that call at the contracted per-minute call rate. Thus, in this scenario, it is possible that a payphone call was attempted to the Andiamo switch through IXC but, if no call record appears at Andiamo’s switch, then the call was never connected, and wouldn’t be eligible for compensation (although Andiamo will have to pay the IXC for the time used anyway).
 - It is likely, given the sheer number of calls typically made, that some have been lost. In fact, Andiamo does a comparison between the number of calls reported handed to it by its IXC’s and the number of call records it has in its switches. There are always some discrepancies. The relative number of discrepancies is included in reports to Andiamo management for trend monitoring. See Report EXH F. Given this report, it is simple to extrapolate how many actual payphone calls, as a percentage of the total number of call records over a statistical reporting period, might have been lost. As long as these ratios remain relatively small, and constant, no action is required. Again, it is important to remember that if there is no Andiamo switch-generated call record, then the call, payphone or other, was never completed, and, thus is never billed nor is it compensable
- *Andiamo performs fraud-monitoring procedures to identify potentially illegitimate payphone calls.*
 - Andiamo routinely updates its fraud algorithms based on experience and industry information. These algorithms are programmed into the Andiamo switches as part of the software systems provided by the switch manufacturer plus user parameters, which the software systems allow Andiamo to include.

-
- *Andiamo has the ability to investigate and resolve PSP disputes.*
 - Andiamo has contracted with BCI to provide clearinghouse services. As such, if the PSP dispute is in regards to compensation received specific to BCI's procedures, the problem can generally be resolved directly with BCI. If there is a possible issue with IXC or customer call record data, Andiamo is capable of running what ad hoc reports are required to validate its compensable payphone records as coming from its switches and being transmitted to BCI.

FCC Compliance Factor (4) – Andiamo adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability.

- *Andiamo has security controls in place to control access to and monitor call-tracking data.*
 - Andiamo maintains its switches according to the procedures defined by the switch manufacturer, NACT.
 - Backups are performed according to a rigid schedule defined in the Andiamo IT Policies & Procedures documentation.
 - Off-site data backup, DLT and CD-ROM or DVD, is maintained.
 - All systems in the data flow path (See Appendix – plates on data flow) require passwords and any access allowing changes or modifications to the system or records require administrator privileges. The systems are
 - The NATX STX switch
 - The MCU (master control unit)
 - The NTS2000 Network Management System
 - The Andiamo SQL data base management system
 - The Andiamo primary backup servers
 - The Andiamo archival DLT carousel.
 - Call Tracking data, read only, is available to auditing, engineering, and accounting personnel as required for the normal business function of Andiamo. Such access levels cannot change or delete customer call data records.
 - The switch software systems provided by NACT, the Andiamo switch manufacturer, make no provisions for customers (Andiamo) to change switch records and provide no utilities to make any changes to records, record formats, or the code witch records those data records.
- *Andiamo has security controls in place to control access to and monitor the payment disbursement system.*
 - The payphone payment disbursement system is maintained by BCI, which has undergone a separate independent audit. Its procedures have been declared sound. Andiamo only provides call records in a format acceptable to BCI. It does not issue payments to PSP's except through BCI. See Reports EXH A.
- *Andiamo has a department that is responsible for making software changes that affect payphone compensation.*
 - Andiamo's Director of Engineering heads the department responsible for software modifications and revisions on the following systems

- NTS2000
- SQL Systems
- Backup/archival systems
- Systems for formatting and sending payphone records to BCI for processing and payment
- Andiamo has a department responsible for maintenance of the switch software systems.
Those systems are
 - NACT STX switches
 - NACT MCU control systems
- *Andiamo has established protocols to implement and test software changes affecting payphone compensation.*
 - Andiamo's software changes fall into two categories:
 - Software and firmware changes to hardware systems like the switches and control units
 - Software changes required by management to improve reporting and to adhere to requirements of BCI call record formats.
 - Software and firmware changes to the switches and ancillary equipment are methodically effected and staged with utmost care. Failure of any of these systems due to unplanned updates or maintenance would prevent Andiamo from performing its core business functions. Changes to these systems affect all types of Andiamo's call types, including payphone compensable calls.
 - Software changes to SQL and reporting systems are reporting changes and report layout changes rather than systems level changes which might affect payphone compensation call recording. Nonetheless, separate audits of the actual data were performed by an outside IT audit specialist to assure that existing SQL procedures did not exclude payphone calls.
- *Andiamo has application controls in place to ensure that network changes, external to payphone compensation, do not negatively impact payphone compensation.*
 - Software and firmware changes to the Andiamo network and ancillary equipment are methodically effected and staged with utmost care. Failure of any portion of the Andiamo network would prevent Andiamo from performing its core business functions. Changes to these systems affect all types of Andiamo's call types, including payphone compensable calls, and all of its day-to-day operations.

FCC Compliance Factor (5) – Andiamo creates a compensable payphone call file by matching call detail records against payphone identifiers.

- *Andiamo utilizes switch data and database look-ups to populate the date, originating ANI, dialed number, and aggregate data into a Compensable Call File.*
 - The Andiamo SQL system performs this function. The output from the SQL system is formatted into a record layout acceptable to BCI. The extrapolated records are then forwarded electronically to BCI for collaboration with its PSP database and for compensation.
- *Andiamo uses payphone specific identifiers (info digits or ANI lists) to identify a compensable payphone call record.*
 - This information is provided to Andiamo in the original SS7 information passed by the IXC or LEC. Please see the CDR record layout in the Appendix section – Plates
- *Andiamo applies validation and control procedures to compile the Compensable Call File.*
 - Andiamo is unable to validate specific PSPs. Accordingly, it uses its SQL to compile a list of calls from payphones (using info-digits) having been “completed” using switch records and call completion cods, call duration records, and other destination information in its switch record. Notwithstanding fraud attempts, a payphone call can only be completed or not completed. Not completed calls are as a result of many possibilities, including invalid destination numbers, busy signals, invalid credit card numbers, PIN cods, and so on. Please see the Appendix – Reports section – FCC-4a, for the parameters used by Andiamo to compile a single payphone record, which is sent to BCI for payment.

FCC Compliance Factor (6) – Andiamo has procedures to incorporate call data into required reports and for making payment to PSPs’

- *Andiamo’s systems are able to generate the following reports on a quarterly basis:*
 - A list of the toll free and access numbers dialed and completed from each PSP’s payphones along with the ANI for each payphone.
 - See Reports Exh B.
 - The volume of calls for each toll free and access number that was completed by (payphone owner) (PSP)
 - Andiamo does not have access to this information, but this report is available for Andiamo from BCI
 - The names(s), address(es), and phone number(s) of the person(s) responsible for handling the (payphone owner)’s (PSP) payphone compensation.
 - Andiamo does not have access to this information, but this report is available for Andiamo from BCI
 - The CIC code or Trunk routing group of all facilities based LD carriers that routed calls to (payphone owner) categorized according to toll-free and access code numbers.
 - Andiamo does not have access to this information, but this report is available for Andiamo from BCI
- *Andiamo possess a valid list of payphone owners identified by ANI.*
 - Andiamo does not have access to this information, but this report is available for Andiamo from BCI

FCC Compliance Factor (7) – Andiamo has implemented procedures and controls needed to resolve payphone compensation disputes.

- *Andiamo maintains required call tracking data for at least 18 months.*
 - Andiamo maintains ALL call records from the time of its inception in February 2004 in the State of Arizona. Andiamo's IT Policies & Procedures call for call record data to be archived indefinitely.
- *Andiamo has the ability to investigate and resolve PSP disputes.*
 - By itself, Andiamo does not have the ability to investigate and resolve PSP disputes. However, in conjunction with BCI, payphone compensation disputes can be resolved as all the requisite information is available between Andiamo and BCI
- *Andiamo has designated personnel who are responsible for payphone compensation dispute resolution.*
 - As noted, Andiamo has a contract with BCI for payphone compensation handling. However, in the event of a dispute, which extends beyond BCI's available information and back to Andiamo's call records, responsibility for this process at Andiamo rests with the Andiamo Chief Technology Office.
Mr. Dimitris Pantzartzis, CTO
Andiamo Telecom, LLC
10575 N. 114th Street #103
Scottsdale, AZ 85259
Phone: 480.346.0001

FCC Compliance Factor (8) – Critical controls and procedures have been tested by Andiamo to verify that errors are insubstantial.

- *Andiamo has procedures to identify payphone-originated calls.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. Please see Appendix – Plates, CDR Record Layouts.
- *Andiamo has procedures to capture dial-around calls.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. Please see Appendix – Plates, CDR Record Layouts
- *Andiamo has procedures to exclude incomplete calls from the Compensable Call File.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. Please see the Appendix – Plates, CDR Record Layouts
- *Andiamo has procedures to accurately populate call record data in Compensable Call File.*
 - Andiamo's SQL systems produce the file formatted according to the BCI specification required for BCI to properly compensate payphone providers
- *Andiamo has procedures to exclude commissioned calls from the Compensable Call File.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. Please see the Appendix – Plates, CDR Record Layouts

FCC Compliance Factor (9) – Andiamo has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:

- i) Identify calls originated from payphones;**
 - ii) Identify compensable payphone calls**
 - iii) Identify incomplete or otherwise non-compensable calls; and**
 - iv) Determine the identities of the payphone service providers to which Andiamo owes compensation.**
- *Andiamo has business rules that identify calls originated from payphones.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. The programming systems to produce these records were developed as a result of pre-defined business rules leading to program generation. These business rules were defined by Andiamo management and implemented by Andiamo's Engineering Department.
 - *Andiamo has business rules that identify compensable payphone calls.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. The programming systems to produce these records were developed as a result of pre-defined business rules leading to program generation. These business rules were defined by Andiamo management and implemented by Andiamo's Engineering Department.
 - *Andiamo has business rules that exclude incomplete calls.*
 - The required information is included in the switch-provided customer call record. Andiamo uses this data to develop reports and produce payphone compensable records for BCI. The programming systems to produce these records were developed as a result of pre-defined business rules leading to program generation. These business rules were defined by Andiamo management and implemented by Andiamo's Engineering Department.
 - *Andiamo has business rules to determine the identities of the payphone service providers to which Andiamo owes compensation.*
 - Andiamo does not have access to the information about payphone owner identities, but this report is available for Andiamo from BCI. BCI's business rules developed the systems necessary to resolve PSP identities from information BCI owns.

V. REQUIRED DISCLOSURES

Andiamo's required disclosures per FCC 64.1320(d)

- Andiamo's criteria for identifying calls originating from payphones include call record info-digit identification of 27, 29 or 70. In addition, originating ANI is also used to identify payphones.
- Andiamo's criteria for identifying compensable payphone calls include all calls with info-digits 27, 29 or 70 (or with a payphone-identified originating ANI) and call duration greater than 0. Calls originating from payphones where Andiamo has a separate compensation agreement (ACA) in place are excluded from the Compensable Call File.
- Andiamo's criteria for identifying incomplete or otherwise non-compensable calls include:
 - 1) calls that do not have info-digits 27, 29 or 70 (or that are not from a payphone-identified originating ANI),
 - 2) calls with a duration of 0 or
 - 3) calls that originate from payphones where Andiamo has a alternate compensation agreement (ACA) in place.
- Andiamo's criteria used to determine the identities of the PSP's to which Andiamo owes compensation is established by BCI, Andiamo's clearinghouse for settlements. BCI's procedures regarding this have been separately audited.
- The type of information that Andiamo needs from the PSPs in order to compensate the PSPs is determined by BCI, collected by BCI and implemented into the BCI payphone compensation processes.

VI. Data Integrity & Audit Process

Audit Standard Basis

The actual independent data audit process followed as much as possible the "AICPA Attestation Standards" and the "FCC Recommended MCI Audit Guidelines."

The Relationship of Attestation Standards to Quality Control Standards

The practitioner is responsible for compliance with the American Institute of Certified Public Accountants' (AICPA's) Statements on Standards for Attestation Engagements (SSAEs) in an attest engagement. Rule 202, *Compliance With Standards*, of the Code of Professional Conduct [ET section 202.01], requires members to comply with such standards when conducting professional services.

A firm of practitioners has a responsibility to adopt a system of quality control in the conduct of a firm's attest practice. Thus, a firm should establish quality control policies and procedures to provide it with reasonable assurance that its personnel comply with the attestation standards in its attest engagements. The nature and extent of a firm's quality control policies and procedures depend on factors such as its size, the degree of operating autonomy allowed its personnel and its practice offices, the nature of its practice, its organization, and appropriate cost-benefit considerations. [As amended, effective September 2002, by Statement on Standards for Attestation Engagements No. 12.]

Attestation standards relate to the conduct of individual attest engagements; quality control standards relate to the conduct of a firm's attest practice as a whole. Thus, attestation standards and quality control standards are related and the quality control policies and procedures that a firm adopts may affect both the conduct of individual attest engagements and the conduct of a firm's attest practice as a whole. However, deficiencies in or instances of noncompliance with a firm's quality control policies and procedures do not, in and of themselves, indicate that a particular engagement was not performed in accordance with attestation standards. [As amended, effective September 2002, by Statement on Standards for Attestation Engagements No. 12.]

General Standards

Training and Proficiency

The first general standard is – *The engagement shall be performed by a practitioner having adequate technical training and proficiency in the attest function.*

Adequate Knowledge of Subject Matter

The second general standard is – *The engagement shall be performed by a practitioner having adequate knowledge of the subject matter.*

Suitability and Availability of Criteria

The third general standard is – *The practitioner shall perform the engagement only if he or she has reason to believe that the subject matter is capable of evaluation against criteria that are suitable and available to users.*

Independence

The fourth general standard is – *In all matters relating to the engagement, independence in mental attitude shall be maintained by the practitioner.*

Due Professional Care

The fifth general standard is – *Due professional care shall be exercised in the planning and performance of the engagement.*

VII Description of Controls and Tests Performed

My tests of the effectiveness of controls included such tests as I considered necessary in the circumstances to evaluate whether those controls, and the extent of compliance with them, are sufficient to provide reasonable, but not absolute, assurance that the specified control objectives were achieved during the period from July 1, 2007 to June 30, 2008. My tests of the operational effectiveness of controls were designed to cover the period from July 2007 through June 2008. In selecting particular tests of the operational effectiveness of control, I considered the (a) nature of the items being tested, (b) the types and competence of available evidential matter, (c) the nature of the control objectives to be achieved, (d) the assessed level of control risk, and (e) the expected efficiency and effectiveness of the test.

Test procedures performed in connection with determining the operational effectiveness of controls are described below:

Test	Description
1. Corroborative inquiry	Made inquiries of appropriate personnel and corroborated responses with other personnel to ascertain the compliance of controls.
2. Observation	Observed application of specific controls.
3. Inspection of evidential material	Inspected documents and reports indicating performance of the controls.
4. Transaction testing	Reperformed application of the controls.

Procedures and Testing

Melvyn D. Ohre, CPA (MDO) judgmentally selected the month of April 2008 to verify that the correct amount was paid to Payphone Service Providers (PSP's). MDO reconciled the records validated by BCI to the amount booked by Andiamo and finally to the amount paid to the PSP's.

All BCI fees are due and payable for all records submitted, whether or not validated. The amount owed for DAC (.494/ea) to BCI is only for those calls that have been validated.

MDO, from Andiamo's DAC summary report, selected a sample of payphone calls to verify the amount listed for calls from NACT LD & Prepaid Dataset 1 (see Report 1).

MDO reconciled the amount submitted to BCI and totals validated by BCI (see Report 2). This report shows a section called "Back Claims Processed", which summarized amounts that have been validated since the last invoice and is now due and payable.

MDO reviewed the BCI Report 3, which summarized total records submitted, the amounts of records paid to date and the remaining records left to be validated, should a PSP submit a claim. PSP can request compensation for the current quarter and up to six preceding quarters. Should validation of the outstanding records not be made within this time period, Andiamo's payment obligation becomes nullified for those records remaining invalidated (see Report 3).

MDO ascertained that Andiamo did not issue a "Discrepancy Report" because this report is only issued if the PSP notifies Andiamo that they perceive an issue.

MDO verified the correct amount was booked by Andiamo for April and the quarter ending June 30, 2008 (see Report 4).

MDO verified that Andiamo paid the correct amount for April and the quarter ending June 30, 2008 (See Report 5).

ACCOUNTS PAYABLE TRIAL BALANCE

ALL OPEN INVOICES

DIVISION NO. 00 MAIN COMPANY VENDORS

VENDOR INVOICE NO	DATES			H L D	INVOICE AMOUNT	DISCOUNT AMOUNT	INVOICE BALANCE	TRANSACTION			CHECK NUMBER	CHECK DATE
	INVOICE	DUE	DSCNT					TYPE	DATE	AMOUNT		
BILLING Billing Concepts												
AD1061407	06/14/07	06/14		N	.51	.00	.51	INV	06/14/07	.51		
Q12007BACK	06/14/07	06/14		N	142.76	.00	142.76	INV	06/14/07	142.76		
Q12007DAC	06/14/07	06/14		N	35,115.99	.00	35,115.99	INV	06/14/07	35,115.99		
Q12007INTR	06/14/07	06/14		N	2,512.93	.00	2,512.93	INV	06/14/07	2,512.93		
Q22006DAC	08/23/06	08/23		N	73,591.67	.00	73,591.67	INV	09/14/06	73,591.67		
Q22007BACK	08/23/07	08/23		N	129.42	.00	129.42	INV	09/14/07	129.42		
Q22007DAC	08/23/07	08/23		N	33,788.61	.00	33,788.61	INV	09/14/07	33,788.61		
Q22007INTR	08/23/07	08/23		N	3,288.24	.00	3,288.24	INV	09/14/07	3,288.24		
Q22008DAC	09/02/08	09/02		N	11,144.15	.00	11,144.15	INV	10/31/08	11,144.15		
Q32006BACK	11/30/06	12/15		N	232.68	.00	232.68	INV	12/07/06	232.68		
Q32006DAC	11/30/06	12/15		N	25,859.42	.00	25,859.42	INV	12/07/06	25,859.42		
Q32006INTR	11/30/06	11/30		N	1,547.93	.00	1,547.93	INV	12/07/06	1,547.93		
								ADJ	01/01/07	1,547.93-		
								ADJ	01/01/07	1,547.93		
								PMT	01/03/07	1,547.93-	023125	01/03/07
								PMT	01/17/07	1,547.93	023232	01/17/07
Q32007BACK	11/30/07	11/30		N	129.92	.00	129.92	INV	12/15/07	129.92		
Q32007DAC	11/30/07	11/30		N	26,877.55	.00	26,877.55	INV	12/15/07	26,877.55		
Q32007INTR	11/30/07	11/30		N	4,006.41	.00	4,006.41	INV	12/15/07	4,006.41		
Q42006BACK	03/14/07	03/14		N	333.93	.00	333.93	INV	03/14/07	2,333.93		
								ADJ	05/01/07	2,000.00-		
Q42006DAC	03/14/07	03/15		N	19,454.71	.00	19,454.71	INV	03/14/07	19,454.71		
Q42006INTR	03/14/07	03/15		N	2,092.79	.00	2,092.79	INV	03/14/07	2,092.79		
Q42007BACK	02/27/08	02/27		N	348.26	.00	348.26	INV	03/31/08	348.26		
Q42007DAC	02/27/08	02/27		N	17,371.51	.00	17,371.51	INV	03/31/08	17,371.51		
Q42007INTR	02/27/08	02/27		N	4,594.21	.00	4,594.21	INV	03/31/08	4,594.21		
TRALDPA:ACIF	08/01/08	08/01		N	7,200.00-	.00	7,200.00-	INV	08/01/08	7,200.00-		
VENDOR BILLING TOTALS:					255,363.60	.00	255,363.60			255,363.60		
DIVISION 00 TOTALS:					255,363.60	.00	255,363.60			255,363.60		
REPORT TOTALS:					255,363.60	.00	255,363.60			255,363.60		

ACCOUNTS PAYABLE AGED INVOICE REPORT

ALL OPEN INVOICES - AGED BY INVOICE DATE

DIVISION NO. 00 MAIN COMPANY VENDORS

VENDOR/ INVOICE NO	DATES		I. DISCNT	I. BALANCE	DISCOUNT AMOUNT	CURRENT	30 DAYS	60 DAYS	90 DAYS	120 DAYS
	INVOICE	DUED								
BILLING Billing Concepts										
A11061407	06/14/07	06/14	N	51	00					51
Q12007BACK	06/14/07	06/14	N	142.76	00					142.76
Q12007DAC	06/14/07	06/14	N	35,115.99	00					35,115.99
Q12007INTR	06/14/07	06/14	N	2,512.93	.00					2,512.93
Q12008BACK	06/13/08	06/13	N	447.06	.00				447.06	
Q12008DAC	06/13/08	06/13	N	11,916.76	00				11,916.76	
Q22006DAC	08/30/06	08/30	N	73,591.67	00					73,591.67
Q22007BACK	08/23/07	08/23	N	129.42	00					129.42
Q22007DAC	08/23/07	08/23	N	33,788.61	.00					33,788.61
Q22007INTR	08/23/07	08/23	N	3,288.21	00					3,288.21
Q22008BACK	09/02/08	09/02	N	144.74	00					
Q22008DAC	09/02/08	09/02	N	11,144.15	00					
Q22008FEES	09/02/08	09/02	N	3,000.00	.00					
Q32006BACK	11/30/06	11/30	N	232.68	.00					232.68
Q32006DAC	11/30/06	11/30	N	25,859.42	.00					25,859.42
Q32006INTR	11/30/06	11/30	N	1,547.93	00					1,547.93
Q32007BACK	11/30/07	11/30	N	129.92	00					129.92
Q32007DAC	11/30/07	11/30	N	26,877.55	.00					26,877.55
Q32007INTR	11/30/07	11/30	N	4,006.41	.00					4,006.41
Q42006BACK	03/14/07	03/14	N	333.93	00					333.93
Q42006DAC	03/14/07	03/14	N	19,454.71	00					19,454.71
Q42006INTR	03/14/07	03/15	N	2,092.79	00					2,092.79
Q42007BACK	02/27/08	02/27	N	348.26	.00					348.26
Q42007DAC	02/27/08	02/27	N	17,371.51	00					17,371.51
Q42007INTR	02/27/08	02/27	N	4,594.21	00					4,594.21
TRALDPACTF	08/01/08	08/01	N	7,200.00-	00			7,200.00-		
VENDOR BILLING TOTALS				270,872.16	00	14,288.89	00	7,200.00-	12,363.82	251,419.45
DIVISION 00 TOTALS				270,872.16	00	14,288.89	00	7,200.00-	12,363.82	251,419.45
REPORT TOTALS				270,872.16	00	14,288.89	00	7,200.00-	12,363.82	251,419.45

144.74
11,144.15
3,000.00
2nd QTR
2008

Summary April 2008 DAC

	DAC Amount @ .494/ea	BCI Fee Amount @ 03/ea	Total	
Total records submitted to BCI:	7741	\$3,824.05	\$232.23	\$4,056.28
Total records Validated by BCI:	7741	\$3,824.05		
Additional BCI fees (\$1000/mo min):			\$767.77	
Total Amount booked for Apr08:		\$3,824.05	\$1,000.00	\$4,824.05

All BCI fees are due and payable for all records submitted, whether or not validated. The amount owed for actual DAC (.494/ea) to BCI is only for those calls that have been validated.

On the invoice there is a section called BACK CLAIMS PROCESSED. This section summarizes amounts that have been validated since the last invoice and are now due and payable. The second page of the BCI report summarizes total records submitted, the amount of records paid to date, and the remaining records left to be validated, should a PSP submit a claim.

Per the FCC, a PSP can request compensation for the current quarter, and up to 6 preceding quarters. Should validation of outstanding records not be made within this time period, Andiamo's payment obligation becomes nullified for those records remaining invalidated.

Note: There is no longer an Operator Services (OS) division for Andiamo. Any reference to Operator Services needs to be removed from the audit.