Honorable City Council  
Attn: Finance Committee  
Palo Alto, California  

Auditor’s Office Review of City Telephone Rates and Charges  

Executive Summary  

We estimate the City could save approximately $235,000 each year if it had more competitive rates for landline telephone service and telecommunication lines and improved oversight of its landline telephone service. A number of issues with the City’s current oversight were identified, including: the lack of a contract with its service provider; a cumbersome billing process; potentially inappropriate and unnecessary charges; and an inaccurate and incomplete internal call accounting system for seeking employee reimbursement of personal calls.

Introduction  

We initiated this review in accordance with Article IV, Section 12 of the City Charter and added it to the fiscal year 2009 work plan through our quarterly reporting process. We conducted this review in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background  

In fiscal year 2009, the City paid AT&T approximately $545,000 for landline telephone service and associated telecommunication lines. According to Administrative Services Department (ASD) staff, the City’s telephone system consists of a combination of 1) City-owned telephone lines and 2) lines owned by the City’s service provider, AT&T. The telephone system is structured as a private branch exchange (PBX) with some off-premise extensions and business lines. According to information provided by ASD staff, the City telephone system has approximately 1,400 telephone extensions and 550 business lines. The City’s Information Technology Services Division, part of ASD, manages the telephone system.

Objective, Scope and Methodology  

The objective of this review was to assess the overall cost effectiveness of the City’s landline telephone rates and charges. This review does not include cellular telephone rates and charges. The scope of our review covered local and long distance billing and call accounting data for the period of January through April 2009. We also reviewed telephone charges for fiscal years 2004-
2009 to evaluate historical trends in telephone charges. We selected a sample of telephone calls from the City’s internal call accounting system and compared those calls to the City’s actual bills to ensure the call accounting system reports were appropriately generated.

To evaluate the appropriateness of the City’s telephone rates, we compared the City’s local and long-distance rates to the rates of other local jurisdictions, including Redwood City, the cities of San Jose, Milpitas, San Mateo, Santa Clara and Berkeley, as well as the counties of Santa Cruz and Santa Clara.

**Finding 1: The City should seek more competitive telephone rates**

Based on our review, the City could save approximately $19,600 each month or $235,000 a year by obtaining a more competitive rate structure for its telephone service. The City’s telephone bills currently detail rates based on monthly service charges, per minute usage rates, and additional miscellaneous charges. The City pays approximately 3 cents per minute for local calls, approximately 18 cents per minute for in-state long-distance, and approximately 32 cents per minute for out-of-state long distance calls. These rates are more than 2 to 13 times higher than rates paid by other jurisdictions we reviewed. The following example is a comparison of the City’s average per minute rates compared to the rates of jurisdictions we contacted.

**Exhibit 1: Per Minute Rate Comparison**

<table>
<thead>
<tr>
<th></th>
<th>Average rate for surveyed jurisdictions (per minute)</th>
<th>Palo Alto’s average rate (per minute)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Calls</td>
<td>$.011</td>
<td>$.028</td>
</tr>
<tr>
<td>In-state Long Distance</td>
<td>$.022</td>
<td>$.182</td>
</tr>
<tr>
<td>State-to-state Long Distance</td>
<td>$.024</td>
<td>$.321</td>
</tr>
</tbody>
</table>

Source: Phone bills and information obtained from surveyed jurisdictions

We estimate that if the City obtained similar per minute rates it could save more than $80,000 per year. Most of the jurisdictions we surveyed participate in the statewide CALNET telecommunications contract which provides government entities in the state with significant cost savings on telecommunications service. For example, the City pays monthly service charges that are more than two times higher than the monthly service rates offered by the CALNET contract. If the City obtained monthly rates similar to those offered under the CALNET contract, it could also save an estimated $155,000 a year.

According to ASD staff, the City does not have a contract with its provider. The lack of a contract for phone service may weaken provider accountability and protection for the City against future rate increases. If the City were able to utilize the CALNET contract or obtain similar contract terms, the City would have additional protection against rate increases. In response to our findings, ASD staff reported they are currently evaluating options to secure a competitive contract and rate structure for telecommunications service.
Finding 2: The City should enhance its oversight of telephone charges and use

In our opinion, the current telephone billing process is inefficient and prevents a thorough review of phone charges. Although the City provides some limited oversight of landline telephone charges, it does not monitor several key aspects of the service and should take steps to enhance its oversight.

**The City should consolidate its telephone billing**

Our review found that the City’s telephone bills are disaggregated, labor-intensive, and difficult to reconcile. The City paid an average of 97 telephone bills each month during the period we reviewed. The City receives separate bills for local and long-distance calling, resulting in multiple bills each month for many phone lines. In addition, some extensions are billed under different billing account numbers for local and long-distance calling, making reconciliation difficult.

**The City should review telephone bills to prevent inappropriate and unnecessary charges**

Our review of the City’s telephone bills identified a number of potentially inappropriate or unnecessary charges. For instance, we identified more than 200 extensions without usage charges during the April billing period. While some of these extensions serve legitimate purposes, such as fire alarms or receiving in-bound calls, our analysis found that the oversight of these lines could be improved.

We also identified additional charges that could be reduced or prevented through better oversight. For instance, the City paid more than $100 each month in directory assistance calls during the period we reviewed, even though there are several free directory assistance services available. In addition, the City repeatedly paid minimum long distance charges of $20.95 per month on several extensions even though long distance services were used infrequently on these lines. We also identified a telephone number on the City’s bill that appears to belong to a private residence. ASD staff was not able to identify a legitimate business use for this number.

**The City’s internal call accounting system should be improved**

The City uses an internal call accounting system, called TeleMate, to document employee calls for the purpose of requesting reimbursement from employees for their personal calls. However, we found this system is configured with an inaccurate rate structure and does not capture all of the City’s phone calls. As a result, the City may not be able to effectively oversee telephone use.

Although the City’s policy requires employees to reimburse the City for personal calls\(^1\), according to ASD staff, because of technical issues with the system, it has been about two years since the City last produced the TeleMate report to request reimbursement from employees for personal calls. In May 2009, ASD sent the report to City departments covering calls made between January and March 2009. If an employee reimbursed the City based on the data provided to them by the call accounting system in May 2009, they may have overpaid the City for the three month period. The

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\(^1\) The City’s Telephone Use Policy, issued in 1996, requires employees to reimburse the City for personal calls that were not authorized for communicating work schedules, emergency situations, or other work-related information.
following examples are a comparison of the City’s actual rates compared to the rates reported in the internal call accounting system.

### Exhibit 2: Comparison of City’s Actual Rates and City’s Internal Call Accounting System Rates

<table>
<thead>
<tr>
<th>Type of Call</th>
<th>Actual Average Rate (per minute)</th>
<th>Internal Call Accounting System (per minute)</th>
</tr>
</thead>
<tbody>
<tr>
<td>International</td>
<td>$2.14</td>
<td>$11.59</td>
</tr>
<tr>
<td>International</td>
<td>$1.20</td>
<td>$3.82</td>
</tr>
<tr>
<td>State-to-state long-distance</td>
<td>$.321</td>
<td>$1.39</td>
</tr>
<tr>
<td>In-state long-distance</td>
<td>$.182</td>
<td>$.30</td>
</tr>
</tbody>
</table>

Source: Phone bills and TeleMate data for January through April 2009.

Thirteen reimbursements have been filed during the period we reviewed.2 However, employees submitting telephone reimbursements would have paid the incorrect rates in the TeleMate report. For example, one employee reimbursed the City $39.60 for personal calls made between January and March, although the actual cost for those calls was only $22.44.

In conclusion, we recommend the following:

**Recommendation 1:** ASD should obtain a phone service contract with competitive billing rates.

**Recommendation 2:** ASD should obtain consolidated billing from the selected provider and develop a process to review bill payments for accuracy and appropriateness.

**Recommendation 3:** ASD should review the current telephone oversight policies and procedures and ensure that employees are provided with accurate information when they reimburse the City for personal calls.

The City Auditor’s Office would like to thank the staff of the Administrative Services Department and Information Technology Services Division for their cooperation and assistance during our review.

Respectfully submitted,

Lynda Flores Brouchoud
City Auditor

Audit staff: Ian Hagerman, Senior Auditor

Attachment: City Manager Response

2 The City’s documentation did not specify if any of these reimbursements were for cellular phone use.
Memorandum

Date: September 8, 2009
From: James Keene, City Manager
Prepared by: Lalo Perez, Administrative Services Director
Subject: City Manager Response to the Audit of City Telephone Rates

Background:
Over the past 4 months, the City Auditor’s Office performed an audit of City Telephone Rates. The Auditor began a review of the telephone charges when Information Technology reinitiated sending phone statements to departments. The City Manager raised simultaneous concerns after seeing some of the statements and supported the Auditor’s review. The objective of this review was to assess the overall cost effectiveness of the City’s landline telephone rates. This review only addressed local and long-distance rates for landline telephone service and does not include cellular or international rates and charges. It is acknowledged there was not sufficient oversight for telecommunication services. This was due to staff reductions, including a frozen IT Manager position, and oversight responsibilities were not reassigned. The Information Technology Division is now taking measures to remedy the situation as detailed below. Information Technology would like to thank the Auditor’s Office for identifying areas where improvements can be made.

Overview:
The City of Palo Alto receives various telecommunication services from AT&T. The City’s telephone system is structured as a private branch exchange (PBX) with some off-premise extensions and business lines. It should also be noted that many staff utilize cell phones in lieu of landline telephones. The following are an example of some of the landline telephone services and features that AT&T provides:

<table>
<thead>
<tr>
<th>Type</th>
<th>~ Quantity</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Access Lines (1MB, 1ML)</td>
<td>550</td>
<td>These lines are used for: faxes, alarm systems, credit card machines, and sprinkler systems. Call details are provided in AT&amp;T billing.</td>
</tr>
<tr>
<td>Extensions/PBX Trunks: Direct Inward Dialing (DID) Blocks</td>
<td>1400</td>
<td>AT&amp;T provides the trunk line, the City provides the extension. A flat rate is charged for the trunk and usage is billed on top of</td>
</tr>
<tr>
<td>Type</td>
<td>Quantity</td>
<td>Comments</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>ADN Circuit Mileage</td>
<td>20</td>
<td>These are monthly flat rates</td>
</tr>
<tr>
<td>T1 Circuit Mileage</td>
<td>26</td>
<td>These are monthly flat rates</td>
</tr>
</tbody>
</table>

Additionally, AT&T provides communication services (not reviewed in this audit) such as:

Recommendation 1: ASD should obtain a phone service contract with competitive billing rates.

Staff agrees with this recommendation.

To address the need for obtaining more competitive billing rates, staff is researching the ability to utilize a State contract, “CALNET 2.” This contract has aggressively negotiated rates that went through a competitive bid process and extends to other Public Sector entities. The contract was awarded in January 2007 and is a 5 year contract with (2) two (1) year extensions. The Palo Alto Municipal Code stipulates, in Section 2.30.360, J, 2, in order to utilize the CALNET 2 contract, the contract must have been awarded within twelve months of the date the city contracts for the goods and/or services. However, staff is currently working with the Attorney’s office and Purchasing Division to execute the contract as the original intent of the contract was for all public agencies to utilize regardless of the time frame. Staff expects to have the CALNET 2 contract on the Council agenda by October 2009.

Recommendation 2: ASD should obtain consolidated billing from the selected provider and develop a process to review bill payments for accuracy and appropriateness.

Staff agrees with this recommendation.

Staff is working with AT&T to develop an appropriate billing structure for the multiple services in the State CALNET 2 contract. To identify an appropriate billing structure, staff will first inventory all services that AT&T provides. This includes identifying each line,
what it is used for, and by whom. Once the inventory is complete, staff will then group all
like services for billing. Billing groups might consist of the following:

- All business access lines (1MB, 1ML)
- All communication lines (T1 Circuits)
- All Long Distance Charges

By grouping services, fewer bills will need to be processed and information will be properly
organized. This will also result in easier bill review and less administrative processing.

**Recommendation 3**: ASD should review the current telephone oversight policies and
procedures and ensure that employees are provided with accurate information when they
reimburse the City for personal calls.

Staff agrees with this recommendation.

Once the CALNET 2 contract is executed, the new rates will be entered into the Internal Call
Accounting system. This will then allow IT to disperse monthly call details to departments,
with accurate rates, and will allow departments to review call details for appropriate use and
reimbursements. Staff is also reviewing the existing Telephone Use Policy and updating if
needed. For any previous reimbursements, staff is following up with individuals to
determine if appropriate amounts were reimbursed and resolving any inaccuracies.

In addition to the Auditor’s Recommendations, IT is also implementing:

- **New Management Oversight of the Billing**

IT will distribute call details and charges monthly to departments for departmental scrutiny
of telephone usage. The expectation is that employees will review their phone bills and
reimburse the City for any non work-related phone calls. Managers will also review for any
non work-related usage. Additionally, IT has assigned an IT Manager along with a Sr.
Technologist to provide more oversight over the telecommunications billing.

- **Telecommunication Contract**

IT will ensure a contract is executed and maintained for all telecommunication services to
ensure rates are always competitive and negotiated. This includes communicating with the
State to ensure the City of Palo Alto participates with any future State contracts as economies
of scale yield more competitive rates.

- **Telecom Assessment RFP**

IT is in the process of executing a contract that will address evaluating the current state of the
telecommunication system, performing a needs assessment, recommendations on
technologies to use, and approximate budget requirements necessary to implement. This assessment is expected to begin November 2009.

- **Cellular Phones**
Cellular phones are currently under contract and rates are reviewed annually. In April 2009, IT staff performed an audit and usage review that resulted in rate plan changes and the elimination of any unused devices.