



July 24, 2014

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Rural Call Completion, WC Docket Number 13-39

Dear Ms. Dortch:

On Tuesday, July 22, the undersigned, representing NTCA – The Rural Broadband Association, Robert Gnapp and Colin Sandy from the National Exchange Carriers Association, and Derrick Owens representing WTA – Advocates for Rural Broadband (collectively, the “Rural Representatives”) met separately with Priscilla Argeris, legal advisor to FCC Commissioner Jessica Rosenworcel and Nick Degani, legal advisor to FCC Commissioner Ajit Pai to discuss continuing problems with rural call completion.

The Rural Representatives explained that calls continue to fail to reach rural areas at an alarming rate -- jeopardizing public safety, harming businesses and inconveniencing consumers. They suggested that as the industry waits for the Office of Management and Budget to complete its Paperwork Reduction Act review and approve the information collection and record keeping requirements adopted by the Commission to address this problem, that the Commission begin taking concrete steps to bring intermediate providers out of the shadows and into full light. The Rural Representatives noted that there is currently no way for carriers to know who many of the intermediate carriers are and there are no controls in place to ensure that they properly route calls.

As proposed in comments on the Commission’s Further Notice of Proposed Rulemaking in this proceeding, the Rural Representatives recommended that every provider in control of call routing be required to register with the Commission and certify that it does not engage in the blocking or restricting of calls to rural areas or that it strips or modifies call detail information. The providers would also certify that they have in place processes to monitor performance and that they route calls only to other certified intermediate providers or directly to terminating local exchange carriers. Additionally, the Rural Representatives recommended that the Commission

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create a carrier contact list so that other carriers experiencing call completion problems know whom to contact at the originating carrier for resolution. It was explained that these requirements would be minimally burdensome, but would help ensure the quality of providers “in the middle.”

The Rural Representatives also briefly discussed call cause codes, expressing support for the Commission’s position that covered originating carriers are required to report them because they serve as a useful indicator of rural call completion problems.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

Jill Canfield
Vice President of Legal and Industry
Assistant General Counsel

Cc: Priscilla Argeris
Nick Degani