

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Information Collection Being Reviewed)	82 Fed. Reg. 48079
By the Federal Communications Commission)	OMB Control No. 3060-1186
)	

**PAPERWORK REDUCTION ACT COMMENTS OF
NTCA – THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits these comments in response to the Notice of Information Collection (“Notice”)² regarding the Paperwork Reduction Act (“PRA”) burdens arising out of an extension of a currently approved information collection requested by the Federal Communications Commission (“Commission”). The Notice seeks comment on the Commission’s request to extend the reporting requirement of FCC Form 480 regarding rural call completion. The record keeping and reporting requirements as adopted apply to long-distance service providers and other covered providers that make the initial long-distance call path choice for more than 100,000 retail long distance subscribers.

As the Commission acknowledges, rural call completion is a “continuing problem” and continued focus on the issue is warranted. The record keeping and reporting requirements at issue have effectively curbed, though not eliminated, rural call completion problems. Small

¹ NTCA represents more than 800 independent, community-based telecommunications companies. All NTCA members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities.

² Information Collection Being Reviewed by the Federal Communications Commission, OMB 3060-1186, 82 FR 48079 (published Oct. 16, 2017).

businesses are not burdened by the requirements as the threshold for compliance is 100,000 subscribers; even burdens to larger companies can be voluntarily mitigated through the Commission's "Safe Harbor" which permits companies to avoid the bulk of the obligations by implementing industry identified best practices to ensure that calls complete.

Any suggestion that the requirements are ineffective or lack practical utility flies in the face of the facts. There is a long and storied history of calls failing to complete to rural consumers and businesses. Every time a call fails it has the potential to negatively effective the well-being or personal safety of rural Americans, or the businesses of small operations in rural America. Despite repeated attempts, nothing the Commission did, up to the point of adopting and implementing the record keeping and reporting requirements proposed in February 2013, had any effect.³ The record keeping and reporting requirements were adopted "to address significant concerns about completion of long-distance calls to rural areas" and to "ensure that long-distance calls to all Americans, including rural Americans, are completed."⁴ Once adopted and implemented, the rules mitigated the problem and helped to accomplish the goal.

The Commission is currently considering eliminating the rules underpinning the reporting requirements. Unless or until other rules are adopted that are demonstrably effective at addressing rural call completion problems, the record keeping and reporting requirements are essential to help ensure the continued completion of calls for rural consumers' and businesses' safety and well-being – and such benefits outweigh the burdens, particularly when the

³ For an exhaustive description of the Commission's failed attempts to address rural call completion before adopting the record keeping and reporting requirements, *see* NTCA's Comments in WC Docket No. 13-39 (filed August 3, 2017)

⁴ Rural Call Completion, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 13-39 (Rel. Nov. 8, 2013).

obligations are tailored to avoid compliance costs for smaller firms and structured as well to permit larger firms to reduce their reporting and record-keeping burdens.

Respectively submitted,



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