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February 7, 2019

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Rural Call Completion – WC Docket No. 13-39

Dear Ms. Dortch:

On February 5, 2019, Fred Moacdieh and I of Verizon met with Nirali Patel, Wireline Advisor to Chairman Ajit Pai, and William Holloway, intern to Ms. Patel. In this meeting, we discussed the Commission's implementation of the Improving Rural Quality and Reliability Act of 2017 ("RCC Act").¹

We reiterated our longstanding support for the Commission's efforts to address rural call completion issues. Consistent with our comments² and prior discussion with the Wireline Competition Bureau,³ we explained that the Commission should adopt flexible service quality standards for intermediate providers. We noted that the service quality standards could be "the more general adoption of duties to complete calls analogous to those that already apply to covered providers[.]"⁴ We urged the Commission to adopt flexible, technology-neutral service quality standards that are applicable to all carriers.

¹ Improving Rural Call Quality and Reliability Act of 2017, Pub. L. No. 115-129 (2018).

² See Verizon Comments, WC Docket No. 13-39, at 8-10 (June 4, 2018); Verizon Reply Comments, WC Docket No. 13-39, at 2-5 (June 19, 2018).

³ See Verizon Ex Parte Letter, WC Docket No. 13-39 (Nov. 13, 2018).

⁴ Senate Committee on Commerce, Science, and Transportation, "Improving Rural Call Quality and Reliability Act of 2017," S. Rep. No. 115-6 on S. 96 at 6 (Mar. 21, 2017).

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We also urged the Commission to eliminate the data recording and retention requirements upon full implementation of the RCC Act. There is no reason for providers to retain data that has not been useful to address rural call completion issues.

Taking the actions described above will ensure smooth implementation of the new rural call completion requirements while furthering the goal of ensuring that calls are completed to rural areas.

Very truly yours,

/s/ Michele G. Cober

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