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February 15, 2018

Ex Parte Notice

Ms. 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 15, 2018, Christi Shewman (telephonically), William Murphy (telephonically), and the undersigned, all of AT&T, met with D'Wana Terry, Daniel Kahn, Alex Espinoza, Matthew Collins and Zachary Ross of the Wireline Competition Bureau. During the meeting, AT&T and Commission Staff discussed the Commission's ongoing efforts to address rural call completion issues and its pending Further Notice of Proposed Rulemaking.

As stated in our comments¹, AT&T reiterated its support for the Commission to address and complete intercarrier compensation reform to eliminate inefficiencies in the marketplace and the perverse incentives that can be a driver of call completion problems.

AT&T supports an ATIS best practices approach and we re-stated the need to eliminate the current onerous and burdensome data reporting and retention requirements, agreeing with the Commission that these requirements provide little to no value in identifying rural call completion issues. Any future approach that adopts prescribed metrics as a measuring stick cannot account for all marketplace dynamics and could ultimately prove burdensome and counter-productive. Furthermore, AT&T reiterated that the Commission should maintain the Safe Harbor exemption as an incentive to providers to incorporate network management consistent with ATIS best practices.

AT&T takes all call completion issues seriously and stated that we address any complaint immediately; from our observation, we believe that the Commission retains strong enforcement mechanisms that can address systemic shortcomings.

¹ See AT&T comments (August 28, 2017).



Finally, AT&T's view is that rural call completion data collection, retention and reporting, if any, should be limited to traffic terminated to rural ILECs on the NECA list and AT&T believes that list should continue to be updated as necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Nodine", is written over a horizontal line.

Matt Nodine

AT&T Services, Inc.

Cc: D'Wana Terry
Daniel Kahn
Alex Espinoza
Matthew Collins
Zachary Ross