



April 10, 2018

Ex Parte

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

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

Dear Ms. Dortch:

USTelecom – the Broadband Association (USTelecom)¹ submits this ex parte notice in the above referenced proceeding to emphasize its prior comments in this docket and to address the draft item released by the Federal Communications Commission (Commission).² USTelecom continues to support efforts to ensure that rural call completions issues are fully, timely and efficiently resolved.

USTelecom agrees with the Commission’s conclusion that ensuring that calls to rural areas are completed is an important priority and that devising effective and efficient means of addressing unacceptable call failures is essential to rural America. We agree with the Commission’s observation that the rate of rural call completion complaints is declining, and that the the problem will continue to abate with the ongoing transition to bill-and-keep.³ USTelecom generally supports many of the items outlined in the draft order, and believes their final adoption by the Commission will alleviate burdens on covered carriers of collecting information that does not service a useful purpose, while emphasizing monitoring of intermediate providers that more directly addresses potential call failures.

¹ USTelecom is the nation’s leading trade association representing service providers and suppliers for the broadband innovation industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications and broadband services to hundreds of millions of customers around the world.

² Draft Second Report and Order and Third Further Notice of Proposed Rulemaking, *Rural Call Completion*, FCC-CIRC180404 (available at: https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0327/DOC-349940A1.pdf) (visited April 10, 2018).

³ *Id.*, ¶ 7.

For example, USTelecom agrees that the Commission should eliminate its data collection reporting requirements. As noted in the draft item, this information has not been providing the Commission with actionable intelligence about rural call issues, so the costs associated with such reporting are an unnecessary paperwork burden for covered carriers. The Commission's draft item appropriately acknowledges that the costs imposed on covered providers are "significant", and the compliance costs divert funds that could be better targeted towards deploying broadband service, improving network quality, or offering richer service plans.⁴

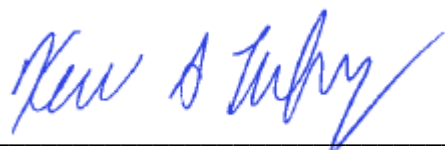
In addition, the Commission's draft item wisely rejects mandating the adoption of specific best practices. USTelecom agrees that companies should have some flexibility in choosing best practices regarding call completion. Choosing the most effective best practices will be unique to each company, its systems, call flows and processes. Imposing identical practices on individual companies may create inefficiencies for different companies and may fail to produce the desired impact on call completion. Given the diversity of company best practices – combined with the fact that many carriers have suitable best practices in place – there is no need for the the Commission to specify or mandate them.

For the reasons discussed herein, the Commission's draft item generally meets the important goal of supporting efforts to ensure that rural calls are effectively completed without unnecessary regulatory costs and burdens.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM ASSOCIATION

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⁴ *Id.*, ¶ 57.