

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Rural Call Completion

WC Docket No. 13-39

Comments of Alaska Communications

Alaska Communications¹ hereby responds to the Commission’s Third Further Notice of Proposed Rulemaking² (the “Further Notice”) in the above-captioned proceeding seeking comment on implementation of the Improving Rural Call Quality and Reliability Act of 2017 (the “RCC Act”).³ Alaska Communications generally supports USTelecom’s comments filed today in this proceeding. Nevertheless, Alaska Communications files these comments to highlight the need to exempt calls routed through non-SS7 switches that use in-band, multifrequency (“MF”) signaling from any intermediate provider service quality, monitoring, recordkeeping, or other compliance requirements it adopts to implement the RCC Act in this proceeding.

Background

The recently-enacted RCC Act requires the Commission to create a registry of each “intermediate provider that offers or holds itself out as offering the capability to transmit covered voice communications from one destination to another and that charges any rate to any other entity (including an affiliated entity) for the transmission,”⁴ and to establish service quality standards for their transmission of such covered voice communications.⁵

¹ In these comments, “Alaska Communications” signifies the operating subsidiaries of Alaska Communications Systems Group, Inc. that would be affected by the “intermediate provider” registration and self-monitoring requirements proposed in the Commission’s Further Notice, which include its rural incumbent local exchange carrier (“ILEC”) affiliates (ACS of Alaska, LLC, ACS of Fairbanks, LLC, and ACS of the Northland, LLC); its long distance affiliate, ACS Long Distance, LLC (“ACS Long Distance”); and Alaska Communications Internet, LLC.

² *Rural Call Completion*, WC Docket No. 13-39, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 18-45 (rel. Apr. 17, 2018).

³ Public Law 115-129, 132 Stat. 329 (2018).

⁴ 47 U.S.C. § 262(a)(1).

⁵ *Id.*, § 262(c)(1)(B).

Affiliates of Alaska Communications appear to serve as “intermediate providers,” as that term is defined in the RCC Act, both for voice traffic that originates in the lower 48 states and terminates to an end user in Alaska, and vice versa. Together with ACS Long Distance, three rural ILEC affiliates of Alaska Communications, operating in five study areas, serve customers in rural and Bush areas of Alaska⁶ using an assortment of roughly 55 aging Nortel DMS-10, Mitel, and Redcom switches, some of which were first placed into service in the 1970s. Only seven of these switches are equipped with SS7.

A significant portion of the traffic carried by affiliates of Alaska Communications therefore is routed using in-band, MF signaling, not SS7. As a result, Alaska Communications in many cases does not receive the detailed cause codes the Commission’s reports would require. Rather, these switches often provide little information beyond an “answer” or “no answer” result, which are intended to support billing of usage-sensitive access charges.

Because these switches do not generate the statistical results needed to support the monitoring of rural call completion performance proposed by the Commission, calls routed using non-SS7 switches should be exempt from any service quality, performance monitoring, recordkeeping, or other compliance requirements that the Commission may adopt for intermediate providers in this proceeding.

⁶ Unlike Alaska’s three largest population centers, and the surrounding rural communities, Alaska Bush communities are isolated geographically from infrastructure resources commonly available elsewhere in the state, and the nation as a whole. Most Bush communities cannot be accessed by road and are not connected to the state’s power grid. To reach these communities, people, as well as goods and services, must arrive by plane, barge, snow machine, all-terrain vehicle, or other off-road transportation means. Communications services in these communities generally must rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

Discussion

The affiliates of Alaska Communications are not “covered providers” subject to the Commission’s existing recordkeeping and reporting rules applicable to calls to rural areas because they are too small to meet the size threshold in the Commission’s definition.”⁷ Because the RCC Act’s definition of an “intermediate provider,” in contrast, contains no size threshold, and because Alaska Communications does “offer[] or hold[] itself out as offering the capability to transmit covered voice communications from one destination to another,” it is possible that one or more of the company’s affiliates will be required to register under the RCC Act.⁸

Alaska Communications takes reasonable steps that are available to prevent “call looping”; ensure “crank back”; not to “terminate and re-originate” calls so as to shift termination costs, or otherwise manipulate signaling information associated with the call.⁹ With respect to traffic bound for destinations in rural Alaska served by switches that lack SS7, there is usually only one routing choice. Crank back and call looping can occur primarily if more than one routing option exists for the call, and if SS7 is operating out-of-band to manage it. Where the call is routed through a switch using MF signaling, the call will either be completed if the called party answers, or the call will fail. If the call fails, there is no way to determine from signaling information whether the failure is the result of a routing issue, or simply that the called party did not answer. In cases where a network issue causes calls repeatedly to fail to reach the called party, Alaska Communications normally is quickly alerted to the issue through its trouble ticket process, and a technician is tasked with the necessary repair.

⁷ 47 C.F.R. § 64.2101.

⁸ Further Notice at ¶ 76.

⁹ Further Notice at ¶¶ 87-88.

For that reason, the Commission should exclude rural call completion data from any service quality, self-monitoring, recordkeeping, or other compliance requirements it adopts for intermediate providers in this proceeding.¹⁰ For voice calls routed using switches that employ MF signaling, Alaska Communications is unable to compile or monitor the statistical information required of “covered providers” under Sections 64.2103 and 64.2105 of the Commission’s rules.¹¹ Furthermore, it would be infeasible to upgrade those switches to SS7 for two reasons. First, the high cost of the necessary A-link transport connectivity to Anchorage would make the change cost-prohibitive. Furthermore, manufacturer support is no longer available for the DMS-10 switching platform, making implementation of SS7 infeasible in any event.

Indeed, the only termination data available for the Alaska Communications rural ILECs reflect access usage contained in Exchange Message Interface (“EMI”) usage records received from the carriers for which these ILECs provide terminating access. Because these records are intended to support billing of access charges, they show completed calls only, and do not provide any information regarding those that are not completed, regardless of the reason.

These issues would similarly affect Alaska Communications ability to compile or maintain statistical records of rural call completion performance, or to file a compliance report or

¹⁰ Further Notice at ¶ 90.

¹¹ 47 C.F.R. §§ 64.2103 – 64.2105. Indeed, several provisions of those rules make explicit reference to SS7 signaling information, which will not be available to Alaska Communications in the case of end users served by switches that use MF signaling. *See, e.g.*, 47 C.F.R. § 64.2103(e)(8) (requiring an “indication whether the call attempt was answered, which may take the form of an SS7 signaling cause code or SIP signaling message code associated with each call attempt”), 64.2103(e)(9) (requiring an “indication whether the call attempt was completed to the incumbent local exchange carrier but signaled as busy, ring no answer, or unassigned number [in] the form of an SS7 signaling cause code or SIP signaling message code associated with each call attempt”). Several other metrics that covered providers must report under Section 64.2105 are similarly unavailable in the MF signaling environment.

certification, as discussed in the Further Notice.¹² Because MF signaling does not create any record of call attempts that are not completed, or the reasons for that outcome, there is no means of tracking performance in that way.

Conclusion

For the foregoing reasons, the Commission should exempt calls routed using non-SS7 switches from any service quality, performance monitoring, recordkeeping, or other compliance requirements that the Commission imposes on intermediate providers to implement the RCC Act in this proceeding.

Respectfully submitted,

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June 4, 2018

¹² Further Notice at ¶¶ 91-92.