

In the Matter of )  
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Rural Call Completion ) WC Docket No. 13-39  
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The South Dakota Telecommunications Association (SDTA) hereby replies to comments submitted on the Commission's proposals regarding rural call completion. SDTA opposes the commenters who argue that more specific service quality requirements should not be imposed on intermediate providers. Further, SDTA supports the comments of NTCA- The Rural Broadband Association (NTCA) that it is premature to remove the Commission's call completion record keeping and retention requirements.<sup>1</sup>

<sup>1</sup> SDTA also supports the Petition for Reconsideration filed by NTCA, in which NTCA asks the Commission to reconsider its decision in the 2018 Rural Call Completion Second Report and Order to not require covered providers to file their documented rural call completion monitoring procedures with the Commission

Because the Commission under its new proposed rules would not require covered providers or intermediate providers to meet any specific call completion metrics (call completion performance targets or thresholds), from SDTA's perspective, as the above-referenced data would suggest, there is little reason to be optimistic that call completion between urban and rural areas will improve industry-wide. With passage of the "Improving Rural Call Quality and Reliability Act of 2017" (RCC Act), Congress instructed the Commission to "establish service quality standards for the transmission of covered voice communications by intermediate providers" and these requirements were specifically envisioned to not only "ensure the integrity of covered voice communications to all customers," but to also specifically "prevent unjust or unreasonable discrimination among areas of the United States in the delivery of covered voice communications." If no uniform call completion thresholds are established by the Commission (setting acceptable call completion targets for providers) and at the same time no call completion record-keeping and data requirements are retained, it would seem impossible to even assess whether either covered providers or intermediate providers are discriminating between rural and non-rural areas in violation of the new RCC Act.

SDTA strongly urges the Commission to investigate different call completion performance targets or thresholds that reasonably may be incorporated into more specific service quality standards for intermediate providers. Absent the adoption of more specific requirements than those currently proposed, the provisions of the RCC Act aimed at targeting and fixing urban-rural call completion discrimination appear to rest in a state of disregard. SDTA believes that the best first step toward solving the unending call completion problems is to establish clear, uniform and national standards for call completion performance that all transmission providers would be expected to meet.

SDTA also urges the Commission to keep its call completion record keeping and retention requirements. The above South Dakota call completion information and the comments of Inteliquent, Inc. (referencing a new call completion issue that has sprung up in the past six months) indicate, despite what some believe, that significant call completion issues persist. This being the case, it continues to be necessary for covered providers and intermediate providers to record and retain call completion data that will be sufficient to test whether the Commission's rules are effective and to identify and resolve call completion issues when they occur. In addition, if there is no requirement to keep data that could be relied on to prove call completion deficiencies, service providers that today may be meeting acceptable call completion rates may be less likely to do so in the future. Similarly, the Commission should reject Verizon's argument that covered providers and intermediate providers should not be required to retain data regarding non-rural call completion rates.

Respectfully submitted,

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