



**Matthew Nodine**  
Assistant Vice President  
Federal Regulatory

**AT&T Services, Inc.**  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036

T: 202.457.3715  
F: 214.486.1602  
matthew.nodine@att.com  
[att.com](http://att.com)

July 29, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2107, AT&T Services, Inc. hereby submits the rural call completion safe harbor certification demonstrating that AT&T continues to manage its intermediate providers to ensure the completion of calls for all customers, both urban and rural.

If you have any questions or need additional information, please contact me at [MN7317@att.com](mailto:MN7317@att.com) or 202-735-7349. Pursuant to section 1.1206 of the Commission's rules, this letter is filed electronically with the Commission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Matt Nodine", with a stylized flourish at the end.

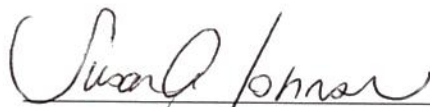
Matt Nodine

**Rural Call Completion Safe Harbor Certification**  
**WC Docket No. 13-39**

Pursuant to 47 C.F.R. § 64.2107(a)(1), I, Susan A. Johnson, Executive Vice President-Global Connection and Supply Chain, an officer of AT&T, certify that, to the best of my knowledge, information and belief, AT&T Services, Inc., and its operating affiliates that are "Covered Providers" as defined in 47 U.S.C. § 64.2101(c) ("AT&T"), restrict by contract any intermediate provider to which a call is directed by AT&T from permitting more than one additional intermediate provider in the call path before the call reaches the terminating provider or terminating tandem. I certify that any nondisclosure agreement with an intermediate provider permits AT&T to reveal the identity of the intermediate provider and any additional intermediate provider to the Commission and to the rural incumbent local exchange carrier(s) whose incoming long-distance calls are affected by the intermediate provider's performance. I certify that AT&T has a process in place to monitor the performance of its intermediate providers.

PRINTED NAME: Susan A. Johnson

POSITION: Executive Vice President—Global Connection Management and Supply Chain

SIGNATURE: \_\_\_\_\_

DATE: 6/19/19

## **AT&T's Process for Monitoring Performance of Intermediate Providers**

AT&T routes traffic to intermediate providers in limited circumstances and only when the intermediate provider satisfies AT&T's high standards for its call termination vendors. AT&T ensures proper, high-quality routing and signaling through internal procedures, including rigorous oversight of intermediate providers and compliance with industry best practices.<sup>1</sup> In addition to limiting the number of intermediate providers in the call path, AT&T's contracts with call termination vendors include terms that, among other things, prohibit looping of calls; and disguising the jurisdictional nature or regulatory classification of a call.<sup>2</sup>

Specifically with regard to monitoring call completion performance by intermediate providers, AT&T receives monthly call completion reporting from intermediate providers in the same format required by the FCC's reporting rules, allowing AT&T to quickly spot any call completion concerns.<sup>3</sup> Moreover, when AT&T enters a new agreement with an intermediate provider, AT&T requires a "proof of concept" trial in which routing is tested and carefully monitored to ensure that calls will complete under the new network arrangements as required by AT&T's standards.

Finally, AT&T actively investigates each rural call completion complaint received regardless of whether the complaint comes from an AT&T customer, a rural LEC, or a rural end user with no relationship with AT&T. In the uncommon instance when a call completion problem is related to its service, AT&T quickly troubleshoots the problem and resolves any technical issue, whether the problem occurs in AT&T's own network or in the network of an intermediate provider.<sup>4</sup> Together, these practices and procedures allow AT&T to effectively monitor the call completion performance of its intermediate providers and efficiently address any completion problems identified.

---

<sup>1</sup> See AT&T Petition at 5-6.

<sup>2</sup> See *id.* at 5 n.21.

<sup>3</sup> See 47 C.F.R. § 64.2105.

<sup>4</sup> See AT&T Petition at 7 n.29.