

In the Matter of)
)
Rural Call Completion) WC Docket No. 13-39

The *2013 RCC Order*² adopted rural call completion data recording, retention, and reporting requirements and charged the Bureau with publishing a Report³ for public comment on the effectiveness of the first two years of reporting. In its Report, the Bureau reaches the right conclusions: the data recording, retention, and reporting have not had their intended impact, even though rural call completion complaints have decreased. Verizon supports the Bureau's Report and asks the Commission to discontinue the burdensome and ineffective data collection, including the Form 480 reports.

- The data recording, retention, and reporting requirements have produced insufficient and unreliable data.
- Although the data reported on Form 480 indicate no improvement in covered providers' reported performance, other indicators—including a notable decrease in rural call completion complaints—suggest *actual* performance may have improved.
- The Commission should eliminate the current reporting, retention, and reporting rules and replace them with more effective rules.

³ See *Rural Call Completion*, Report, 32 FCC Rcd 4980 (2017) (“Report”).

The Commission in 2013 required certain “covered providers” to record, retain, and report data related to rural call completion, anticipating that these data would help the Commission monitor call-completion performance and enforce its rules as necessary.⁴ The *2013 RCC Order* required covered providers to record information about calls attempted to a rural operating company number (OCN) and to submit quarterly reports indicating the number of call attempts, the number of answered calls, and the number of call attempts not answered, reported separately for “busy,” “ring no answer,” and “unassigned number.”⁵ These data were to allow the Commission to calculate a call-answer rate and a network-effectiveness ratio.⁶ The *2013 RCC Order* directed the Bureau to analyze the first eight quarterly reports and to issue a report on the effectiveness of the data recording, retention, and reporting rules.⁷

The Bureau correctly analyzed the limited data and found that the Form 480 data are insufficient and unreliable. Among other things, the FCC’s Form 480 reporting process permits carriers to self-define the categories of calls they report as answered, busy, unassigned, and ring-no-answer, calling into question the comparability of data across carriers, impairing the quality of the reported data and detracting from their utility. In addition the Report noted the unreliability of signaling codes for call categorization. These and other data quality issues have, as the Bureau finds, undermined the data’s reliability.

As a result, the Bureau has found the data have not had their intended effect, both because they have hindered enforcement efforts and because the data indicate no improvement in

⁴ *2013 RCC Order*, ¶ 19.

⁵ Report, ¶ 5.

⁶ *Id.* ¶ 6.

⁷ *See 2013 RCC Order* ¶ 105.

covered providers’ reported performance.⁸ But as the Report also notes, although the reported data do not demonstrate improvement, it is possible that *actual* performance improved during the reporting period. The Report notes that “rural call completion complaints to the Commission *decreased* from 2015 to 2016 (by 57 percent for complaints filed by consumers and by 45 percent for complaints filed by rural carriers).”⁹

This is consistent with Verizon’s experience, in which our investigations into OCNs with low call answer rates have rarely resulted in identified network or technical issues on Verizon’s network, and have not yet identified fraudulent or illegal conduct by a downstream intermediate provider. We have found the most effective means of identifying and resolving call completion issues has been through investigation of specific complaints, which include details such as the date, time, and nature of the problem and the phone numbers involved.

The Bureau has correctly analyzed the limited data and has drawn the correct conclusions in the Report. Prospectively, the Commission should not continue to collect these data. It should eliminate the current data recording, retention, and reporting rules and replace them with targeted rules that will more effectively and efficiently address rural call completion issues. As the Bureau notes in its recommendation, even if the Commission were to modify the data recording, retention and reporting rules, it’s unclear that the benefits would outweigh the burdens.¹⁰ And it is similarly unclear that an alternative data collection would be an improvement or more reliable. The Commission should instead explore less burdensome and more effective alternatives.

⁸ See Report ¶ 38.

⁹ *Id.* ¶ 19 (emphasis added).

¹⁰ See *id.* ¶ 39.

Verizon will address these alternatives to data collection in its upcoming comments responding to the *Second Further Notice of Proposed Rulemaking*.¹¹

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¹¹ *Rural Call Completion*, Second Further Notice of Proposed Rulemaking, WC Docket No. 13-39, FCC 17-92 (July 14, 2017).