

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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

**COMMENTS ON WIRELINE COMPETITION BUREAU  
REPORT OF JUNE 22, 2017**

**I. INTRODUCTION AND SUMMARY**

CenturyLink submits these comments in response to the Rural Call Completion Report issued by the Wireline Competition Bureau on June 22, 2017.<sup>1</sup> CenturyLink's experience as a Safe Harbor provider places it in a unique position to comment on the Report. The company has generated data in a pre-Safe Harbor environment and has also generated data as a Safe Harbor provider. That experience confirms the limited value of the data that providers are collecting under the current rules.

CenturyLink therefore agrees with the recommendation in the Report that the Commission can and reasonably should remove the current recording, retention and reporting requirements. CenturyLink does not believe that tweaking the current reporting requirements would yield significant benefits to consumers, providers or the Commission. CenturyLink does disagree with certain aspects of the analysis in the Report and provides additional comments for the Commission's consideration.

**II. DISCUSSION**

CenturyLink is proud of its network, the quality of its service, and its commitment to industry leadership on rural call completion. Safe Harbor routing policies minimize the number

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<sup>1</sup> See *Rural Call Completion*, Report, WC Docket No. 13-39, DA-17-595 (WCB Jun. 22, 2017) (Report).

of carriers involved in routing a call from origination to completion. Implementing these policies is neither easy nor inexpensive. Additionally, although not required by the Commission's Safe Harbor rule, CenturyLink's policy seeks to limit routing to just one hop. CenturyLink's goal is to ensure a high level of call completion performance for all Americans, including those in rural communities.

CenturyLink's Safe Harbor approach has been effective in addressing call completion issues. With a more limited reliance on intermediate providers, it is much less difficult to find the source of a routing problem if one occurs. In CenturyLink's experience, many of the problems associated with call completion actually arise because of issues with the terminating local exchange carrier. CenturyLink has always worked cooperatively with local exchange carriers to try to be helpful even in those instances.

In CenturyLink's experience, FCC complaints related to call completion have dropped dramatically since CenturyLink adopted Safe Harbor. Any complaint at all is now a rarity. Yet despite this real-world improvement, the statistics measured by the Form 480 have not dramatically changed. This discrepancy suggests that the data collected through the Form 480 process is of very limited value.

The Report identifies a number of shortcomings in the current data reporting requirements. Issues exist regarding the quality of the data,<sup>2</sup> categorizing call types,<sup>3</sup> treatment of intermediary data<sup>4</sup> and timing.<sup>5</sup> Imperfections exist with every metric provided by the data.<sup>6</sup> CenturyLink generally agrees with these conclusions.

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<sup>2</sup> Report, ¶¶ 23-29.

<sup>3</sup> *Id.*, ¶¶ 30-32.

<sup>4</sup> *Id.*, ¶¶ 33-34.

<sup>5</sup> *Id.*, ¶ 40.

CenturyLink respectfully disagrees, however, with the Report's conclusion that call answer rates are the best available measurement of long distance provider performance.<sup>7</sup> Call answer rates appear to reflect the type of traffic being delivered rather than whether the long distance provider is properly delivering traffic to its destination. CenturyLink's data shows little correlation between call answer rates and Safe Harbor routing, geographic location or even whether or not CenturyLink delivers traffic over its own network. The data provided in the Report reflects a wide variety of results and provides little in the way of a discernible pattern other than the unsurprising fact that calls identified as auto-dialer traffic are answered at a much lower rate than other traffic.<sup>8</sup> CenturyLink believes the fundamental flaw in the analysis of the Report is its focus on metrics that appear to have no reliable correlation to customer experience or provider performance.

### **III. CONCLUSION**

CenturyLink recognizes the Commission's ongoing commitment to helping ensure service providers provide a high level of call completion quality, especially to rural areas. Nevertheless, given the flaws in relying on the call answer rate as identified by the Commission, CenturyLink supports the Report's recommendation to eliminate recording, retention and reporting requirements that exist in the current rules. Moreover, CenturyLink does not believe

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<sup>6</sup> *Id.*, ¶ 41.

<sup>7</sup> *Id.*, ¶ 7.

<sup>8</sup> *See, id.*, ¶ 32, Figure 5 (reporting much lower call answer rates for traffic characterized as auto-dialer traffic).

that modifying the specific statistics collected in the Report would yield meaningful tools to further improve call completion performance.

Respectfully submitted,

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