



September 29, 2014

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**Ex Parte**

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

**Re: Notice of Oral *Ex Parte* Communications, WC Docket Nos. 13-39**

Dear Ms. Dortch:

On September 25, 2014, I spoke by phone with Daniel Kahn of the Wireline Competition Bureau to discuss an issue related to the Commission's retention and reporting requirements in the above captioned proceeding.

The Commission's rules require NECA to provide updated lists of rural and nonrural OCNs on an annual basis. *See* 47 C.F.R. § 64.2101(h). Covered providers are to use these lists to categorize calls as rural or nonrural for reporting purposes. After reviewing NECA's February 2014 OCN lists, Verizon has identified several issues that could impact the data that is reported once the rules become effective.

Verizon's call data systems use the Local Exchange Routing Guide (LERG) to associate a particular call to the terminating carrier's OCN. After receiving NECA's 2014 OCN lists, Verizon compared those lists to all of the OCNs in the LERG that are classified as ILEC or RBOC and not marked as "expired." There are nearly 200 OCNs that are contained in the LERG, not marked as "expired," and not on either of NECA's lists. These OCNs fit into one of three categories.

First, for 48 of these OCNs, Verizon is able to associate them with OCNs that are in the NECA lists based on the OCNs' names. Verizon's proposed treatment of these OCNs is attached hereto as Attachment A.

Second, for 28 OCNs contained in the LERG, Verizon cannot correlate them to any of the OCNs on the NECA lists. Those OCNs are listed in Attachment B.

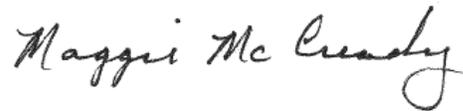
Finally, in addition to the OCNs identified in the attachments, there are over 100 other OCNs in the LERG that are not "expired" and that do not appear on NECA's lists. Verizon reviewed a subset of its long distance call records and did not observe traffic to these OCNs and thus has not determined whether associating these OCNs to OCNs on the NECA lists is feasible.

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As a result, the Bureau needs to reconcile the LERG and NECA lists of OCNs to ensure that calls are accurately captured in the rural/nonrural categories and that all covered providers categorize them consistently. Because providers are working diligently to implement the retention and reporting requirements, the Bureau should resolve this issue quickly to avoid delaying those implementation efforts.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy". The signature is written in black ink and is centered below the word "Sincerely,".

Attachments

cc: Randy Clarke  
Daniel Kahn

## Operating Company Numbers Mapped to NECA List

<b>LERG OCN</b>	<b>LERG State</b>	<b>OCN Name</b>	<b>NECA OCN</b>
0135	NJ	Alteva Of Warwick, LLC	4472
0135	NY	Alteva Of Warwick, LLC	4473
0277	PA	West Side Telephone Co.	4474
0277	WV	West Side Telephone Co.	4475
0338	FL	Quincy Telephone Co.	4454
0338	GA	Quincy Telephone Co	4455
0425	LA	Cameron Telephone Co.	4476
0425	TX	Cameron Telephone Co.	4477
1704	AR	Lavaca Telephone Co.	4445
1704	OK	Lavaca Telephone Co	4446
1788	KS	Kanokla Telephone Association	4443
1788	OK	Kanokla Telephone Association	4444
1807	KS	Mo-Kan Dial, Inc.	4447
1807	MO	Mo-Kan Dial, Inc.	4448
1831	KS	South Central Telephone Association, Inc.	4462
1831	OK	South Central Telephone Association, Inc.	4463
1835	CO	Sunflower Telephone Co., Inc.	4466
1835	KS	Sunflower Telephone Co., Inc.	4467
1888	IA	Grand River Mutual Telephone Co.	4411
1888	MO	Grand River Mutual Telephone Co.	4412
2030	KS	Totah Communications, Inc.	4468
2030	OK	Totah Communications, Inc.	4469
2141	OK	Santa Rosa Telephone Cooperative, Inc.	4458
2141	TX	Santa Rosa Telephone Cooperative, Inc.	4459
2176	AZ	Valley Telephone Cooperative, Inc.	4470
2176	NM	Valley Telephone Cooperative, Inc.	4471
2200	AZ	Fort Mojave Telecom, Inc.	4408
2200	CA	Fort Mojave Telecom, Inc.	4409
2200	NV	Fort Mojave Telecom, Inc.	4410
2220	ID	Filer Mutual Telephone Co.	4435
2220	NV	Filer Mutual Telephone Co.	4436
2226	AZ	Midvale Telephone Exchange, Inc.	4490
2226	ID	Midvale Telephone Exchange, Inc.	4439
2233	ID	Rural Telephone Co.	4404
2233	NV	Rural Telephone Co.	4405
2247	MT	Nemont Telephone Cooperative, Inc.	4452
2247	ND	Nemont Telephone Cooperative, Inc.	4453
2251	MT	Range Telephone Cooperative, Inc.	4456

## Operating Company Numbers Mapped to NECA List

<b>LERG OCN</b>	<b>LERG State</b>	<b>OCN Name</b>	<b>NECA OCN</b>
2251	WY	Range Telephone Cooperative, Inc.	4457
2262	NM	E.N.M.R. Telephone Cooperative	4406
2262	TX	E.N.M.R. Telephone Cooperative	4407
2295	ID	Silver Star Telephone Co., Inc.	4460
2295	WY	Silver Star Telephone Co., Inc.	4461
2390	ID	Oregon – Idaho Utilities, Inc.	4488
2390	OR	Oregon – Idaho Utilities, Inc.	4489
2404	OR	Asotin Telephone Co.	4415
2404	WA	Asotin Telephone Co.	4416
2423	ID	Inland Telephone Co.	4441
2423	WA	Inland Telephone Co.	4442
9102	MA	Verizon New England, Inc.	5112
9102	RI	Verizon New England, Inc.	5114
9104	CT	Verizon New York, Inc.	5131
9104	NY	Verizon New York, Inc.	5130
9147	CT	Southern New England Telephone Co.	5200
9206	NJ	Verizon New Jersey, Inc.	5120
9208	PA	Verizon Pennsylvania, Inc.	5000
9210	DE	Verizon Delaware, Inc.	5010
9211	DC	Verizon Washington, DC Inc.	5020
9212	MD	Verizon Maryland, Inc.	5030
9213	VA	Verizon Virginia, Inc.	5040
9214	WV	Frontier West Virginia, Inc.	5050
9321	OH	Ameritech Ohio	5150
9323	MI	Ameritech Michigan	5090
9325	IN	Ameritech Indiana	5080
9327	WI	Ameritech Wisconsin	5220
9329	IL	Ameritech Illinois	5070
9329	WI	Ameritech Illinois	5220
9348	KY	Cincinnati Bell, Inc.	5061
9348	OH	Cincinnati Bell, Inc.	5062
9417	AL	BellSouth Telecomm Inc. DBA Southern	5181
9417	FL	BellSouth Telecomm Inc. DBA Southern	5191
9417	GA	BellSouth Telecomm Inc. DBA Southern	5192
9417	NC	BellSouth Telecomm Inc. DBA Southern	5193
9417	SC	BellSouth Telecomm Inc. DBA Southern	5194
9419	AL	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5181
9419	FL	BellSouth Telecomm Inc. DBA South Central	5191

## Operating Company Numbers Mapped to NECA List

<b>LERG OCN</b>	<b>LERG State</b>	<b>OCN Name</b>	<b>NECA OCN</b>
		Bell Tel.	
9419	GA	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5192
9419	KY	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5182
9419	LA	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5183
9419	MS	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5184
9419	NC	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5193
9419	TN	BellSouth Telecomm Inc. DBA South Central Bell Tel.	5185
9533	AR	Southwestern Bell	5211
9533	KS	Southwestern Bell	5214
9533	MO	Southwestern Bell	5213
9533	OK	Southwestern Bell	5215
9533	TX	Southwestern Bell	5216
9631	CO	Qwest Corporation	5102
9631	IA	Qwest Corporation	5141
9631	MN	Qwest Corporation	5142
9631	ND	Qwest Corporation	5144
9631	NE	Qwest Corporation	5143
9631	SD	Qwest Corporation	5145
9631	WY	Qwest Corporation	5108
9636	AZ	Qwest Corporation	5101
9636	CO	Qwest Corporation	5102
9636	ID	Qwest Corporation	5103
9636	MT	Qwest Corporation	5104
9636	ND	Qwest Corporation	5144
9636	NE	Qwest Corporation	5143
9636	NM	Qwest Corporation	5105
9636	UT	Qwest Corporation	5107
9636	WY	Qwest Corporation	5108
9638	ID	Qwest Corporation	5162
9638	OR	Qwest Corporation	5163
9638	WA	Qwest Corporation	5161
9740	CA	Pacific Bell	5170
9742	NV	Nevada Bell	5173

## Operating Company Numbers Not Mapped to NECA List

<b>LERG OCN</b>	<b>LERG State</b>	<b>OCN Name</b>
<b>0236</b>	VA	North River Telephone Cooperative
<b>0332</b>	TX	Brazos Telecommunications, Inc.
<b>0497</b>	NC	Piedmont Telephone Membership Corp.
<b>0669</b>	MI	Allendale Telephone Co.
<b>0692</b>	MI	Drenthe Telephone Co.
<b>0720</b>	MI	Peninsula Telephone Co.
<b>0910</b>	WI	Milltown Mutual Telephone Co.
<b>1304</b>	IA	Swisher Telephone Co.
<b>1403</b>	MN	Federated Telephone Cooperative
<b>1405</b>	IA	Alliance Communications Cooperative, Inc. - IA
<b>1406</b>	MN	Alliance Communications Cooperative, Inc. – MN
<b>1423</b>	MN	Runestone Tel. Assn DBA Runestone Telecom Assoc.
<b>1622</b>	ND	Moore & Liberty Telephone Co.
<b>1640</b>	SD	Armour Independent Tel Co DBA Golden West Telecom
<b>1642</b>	SD	Alliance Communications Cooperative, Inc. (Baltic)
<b>1667</b>	SD	Kadoka Tel Co DBA Golden West Telecommunications
<b>1677</b>	SD	Sioux Valley Tel DBA Golden West Telecommunication
<b>1679</b>	SD	Stockholm-Strandburg Telephone Co.
<b>1682</b>	SD	Tri-County Telecom, Inc.
<b>1684</b>	SD	Union Tel. Co. DBA Golden West Telecommunications
<b>1686</b>	SD	Vivian Tel Co DBA Golden West Telecommunications
<b>2315</b>	CA	Global Valley Networks
<b>2342</b>	CA	Citizens Telecom DBA Frontier Comm. of Toulumne
<b>2395</b>	OR	CenturyTel of Oregon DBA CenturyLink
<b>3027</b>	AK	Alascom, Inc. DBA AT&T ALASKA
<b>3402</b>	CA	Citizens Telecomm DBA Frontier Comm. Golden State
<b>280D</b>	SD	Alliance Communications Cooperative, Inc. – SD
<b>864F</b>	NC	Verizon South, Inc. – NC (CONTEL)