



Nicholas G. Alexander
Senior Counsel, Federal Affairs
1220 L Street NW Suite #660
Washington, DC 20005
Tel: (571) 730-6473
Nick.Alexander@level3.com

Oct. 20, 2014

Ex Parte

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

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

Dear Ms. Dortch:

On October 16, 2013, Mack Greene, by telephone, and I, in person, spoke on behalf of Level 3 Communications, LLC (“Level 3”), with Randy Clarke, Daniel Kahn, Jean Ann Collins, Richard Hovey, and John Visclosky, all of the Wireline Competition Bureau’s Competition Policy Division, regarding the above-captioned matter. Specifically, we reviewed with staff the comments Level 3 filed in response to the Wireline Competition Bureau’s Public Notice¹ regarding Appendix C of the *Rural Call Completion Order*.² In addition, we discussed the issues Verizon raised regarding NECA’s February 2014 OCN lists,³ and NECA’s response.⁴ We noted that Level 3 and other carriers will rely on codes in the LERG for reporting purposes.

Sincerely,

/s/ Nicholas G. Alexander
Nicholas G. Alexander

¹ Wireline Competition Bureau Seeks Comment on Whether to Clarify Appendix C of the Rural Call Completion Order, Public Notice, WC Docket No. 13-39, DA 14-526 (rel. Apr. 21, 2014) (Public Notice).

² *Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154 (2013).

³ Letter from Maggie McCready, Vice President, Federal Regulatory Affairs, Verizon, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-39 (filed Sept. 29, 2014).

⁴ Letter from Colin K. Sandy, Senior Regulatory Attorney, Government Relations, NECA, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-39 (filed Oct. 9, 2014).

Marlene H. Dortch

Oct. 20, 2014

Page 2

cc: Randy Clarke
Daniel Kahn
Jean Ann Collins
Richard Hovey
John Visclosky