

EX PARTE

November 25, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, DC 20554

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

Dear Ms. Dortch:

The Commission's new rural call completion rules, codified at 47 C.F.R. § 64.2101(h), require updated, annual lists of rural and non-rural Operating Company Numbers (OCN) from the National Exchange Carrier Association (NECA). Service providers need these lists to determine whether particular calls are rural or non-rural for reporting purposes under the rules.

Earlier this year, NECA published a list of rural and non-rural OCNs. The rural list contained individual rows for unique State/OCN/Carrier combinations. Covered providers have been developing capabilities to report call counts for each State/OCN/Carrier combination on the NECA list in order to comply with the Commission's rules, which will likely be effective shortly. As a result, any changes or clarification of the reporting process at this late juncture will need to be accompanied by a sufficient period to allow carriers to make any necessary adjustments in their reporting systems prior to the rules taking effect.

In a recent discussion with Wireline Competition Bureau Staff and representatives of the National Exchange Carrier Association (NECA), CenturyLink, Level 3, and Verizon discussed steps needed to clarify coverage of particular OCNs.¹ This is especially important where there are mismatches between NECA's listing of rural and non-rural OCNs and the Local Exchange Routing Guide's (LERG) OCN data.

At the conclusion of the telephone conference, the companies agreed to provide the Bureau staff with a joint proposal that would outline how to address the identified problems with the NECA list. The proposal would help the Commission to provide clear instructions to affected parties and thereby help ensure consistent and accurate reporting under the rules.

¹ The discussion was summarized in an ex parte notice previously filed in this docket. *See* Letter to Marlene Dortch (FCC) from Nicholas Alexander (Level 3), filed November 14, 2014 in this docket.

Accordingly, CenturyLink, Level 3, and Verizon present the following outline of steps that should be taken to clarify reporting instructions:

(1) NECA should publish CECC and OOCN list together with its OCN list.

NECA should publish a list of Combined Entity Company Codes (CECC) and Overall OCNs (OOCN) together with its OCN lists for rural and non-rural entity designation. The Commission should explain in its reporting instructions that where the NECA OCN does not match the LERG 6 OCN, but where a match can be made using the LERG 1 OOCN, providers should use the additional lists. The Commission should also note that the CECC can be used in mapping the NECA OCN to the LERG 6 OCN.

To the extent that this mapping process results in requirements for calls associated with multiple OCNs to be aggregated together and reported in a single line-item in the report, covered providers may need to make significant changes to their reporting systems and processes. Covered providers may need several months from the date on which the Commission's requirements are defined to make the necessary changes to their reporting systems.

(2) Where OCNs overlap state lines, providers should report data by OCN.

A single State/OCN/Carrier combination on the NECA list of rural OCNs may actually comprise traffic terminating in both the listed state and an adjacent state. Reporting should be at the OCN level even if the "state" designation on the NECA list might in-fact include traffic from an adjacent state. In this instance, covered providers need not take further steps, such as reviewing NPA-NXX information or other data, to segregate and/or report the data by state.

(3) Canadian and reserved codes should not be included.

The Commission should clarify in instructions that Canadian OCN codes and reserved or unused OCN codes are not required to be reported.

(4) New OCNs should be unreported until listed.

Newly-issued OCNs are not included on the NECA list. The Commission's should clarify in instructions that OCNs that are not on the NECA list are to be unreported until they have been added in the next annual NECA list update.

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(5) Annual updates should occur in the third calendar quarter.

Annual updates to the lists should occur in the 3rd quarter of each calendar year to ensure that covered providers have sufficient time to include the new OCNs in their reports for the first quarter of the following calendar year.

These steps will not completely eliminate the problem of OCNs that are not on the current NECA list, and the Commission should encourage NECA to take additional steps and to work with carriers to reduce the instance of OCNs that lack rural or non-rural designation.

Sincerely,

CENTURYLINK

LEVEL 3

VERIZON

/s/ John E. Benedict

/s/ Nicholas G. Alexander

/s/ Maggie M. McCready

Copy via email to:
Randy Clarke
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