



**John E. Benedict (Jeb)**  
Vice President - Federal Regulatory  
Affairs & Regulatory Counsel  
1099 New York Avenue NW  
Suite 250  
Washington, DC 20001  
202.429.3114

## NOTICE OF EX PARTE

December 9, 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:

On December 6, 2014, Jeb Benedict, Mary Retka, and Jason Topp of CenturyLink spoke by telephone with Claude Aiken, Randy Clarke, Richard Hovey, Daniel Kahn, and John Visclosky of the Wireline Competition Bureau.

During the call, CenturyLink provided an update to the Bureau on CenturyLink's progress implementing the Safe Harbor policies for rural call completion, associated with FCC Order 13-135 in the above-captioned docket. CenturyLink outlined its timeframe for nationwide implementation of its Safe Harbor procedures.

CenturyLink also reviewed concerns it faces in its discussions aimed to establish Safe Harbor agreements with some wireless carriers for terminating calls destined to their wireless subscribers. It explained that certain wireless carriers terminate through their IXC connections, and they have not committed to modifying their routing systems to ensure nonuse of intermediate carriers after CenturyLink's hand-off of calls. There is an additional difficulty in verifying direct terminations for the delivery of wireless calls through a wireless provider, since wireless networks do not provide call signaling records comparable to that of wireline providers like CenturyLink, and such verification is needed to ensure Safe Harbor handling, beyond relying solely on the language of the contract.

CenturyLink also spoke briefly about the need for additional clarifying instructions for providers' use of the various rural and non-rural Operating Company Numbers (OCN) aspects now listed in recently provided information from the National Exchange Carrier Association

Marlene H. Dortch  
December 9, 2014

Page 2 of 2

(NECA) for reporting purposes, following up on previous discussions summarized in ex parte notices filed last month.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

Sincerely,

/s/ John E. Benedict

Copy via email to:

Claude Aiken  
Randy Clarke  
Richard Hovey  
Daniel Kahn  
John Visclosky