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July 31, 2015

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

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

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2107, AT&T Services, Inc., hereby submits the rural call completion safe harbor certification demonstrating that AT&T continues to manage its intermediate providers to ensure the completion of calls for all customers, both urban and rural.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

Rural Call Completion Safe Harbor Certification
WC Docket No. 13-39

Pursuant to 47 C.F.R. § 64.2107(a)(1), I William W Hague, EVP – Global Connection Management, an officer of AT&T, certify that, to the best of my knowledge, information and belief, AT&T Services, Inc., and its operating affiliates that are “Covered Providers” as defined in 47 U.S.C. § 64.2101(c) (“AT&T”)¹, restrict by contract any intermediate provider to which a call is directed by AT&T from permitting more than one additional intermediate provider in the call path before the call reaches the terminating provider or terminating tandem. I certify that any nondisclosure agreement with an intermediate provider permits AT&T to reveal the identity of the intermediate provider and any additional intermediate provider to the Commission and to the rural incumbent local exchange carrier(s) whose incoming long-distance calls are affected by the intermediate provider’s performance. I certify that AT&T has a process in place to monitor the performance of its intermediate providers.

PRINTED NAME: William W Hague

POSITION: EVP – Global Connection Management

SIGNATURE: William W. Hague

DATE: 7/28/2015

¹ Pursuant to the *AT&T Waiver Order*, this certification does not include traffic of AT&T’s Leap Wireless (d/b/a Cricket) affiliate that has not yet been migrated to the AT&T Core Network. See *Rural Call Completion*, WC Docket No. 13-39, Order, 30 FCC Rcd 996, para. 39 (WCB 2015) (*AT&T Waiver Order*). AT&T will fully comply with the record retention and reporting rules only for the Cricket traffic not yet migrated. See *id.*; see also AT&T Services, Inc. Petition for Limited Waiver, WC Docket No. 13-39 at 11-12 (filed Apr. 10, 2014) (*AT&T Petition*).

AT&T's Process for Monitoring Performance of Intermediate Providers

AT&T routes traffic to intermediate providers in limited circumstances and only when the intermediate provider satisfies AT&T's high standards for its call termination vendors. AT&T ensures proper, high-quality routing and signaling through internal procedures, including rigorous oversight of intermediate providers and compliance with industry best practices.² In addition to limiting the number of intermediate providers in the call path, AT&T's contracts with call termination vendors include terms that, among other things, prohibit looping of calls; and disguising the jurisdictional nature or regulatory classification of a call.³

Specifically with regard to monitoring call completion performance by intermediate providers, AT&T receives monthly call completion reporting from intermediate providers in the same format required by the FCC's reporting rules, allowing AT&T to quickly spot any call completion concerns.⁴ Moreover, when AT&T enters a new agreement with an intermediate provider, AT&T requires a "proof of concept" trial in which routing is tested and carefully monitored to ensure that calls will complete under the new network arrangements as required by AT&T's standards.

Finally, AT&T actively investigates each rural call completion complaint received regardless of whether the complaint comes from an AT&T customer, a rural LEC, or a rural end user with no relationship with AT&T. In the uncommon instance when a call completion problem is related to its service, AT&T quickly troubleshoots the problem and resolves any technical issue, whether the problem occurs in AT&T's own network or in the network of an intermediate provider.⁵ Together, these practices and procedures allow AT&T to effectively monitor the call completion performance of its intermediate providers and efficiently address any completion problems identified.

² See AT&T Petition at 5-6.

³ See *id.* at 5 n.21.

⁴ See 47 C.F.R. § 64.2105.

⁵ See AT&T Petition at 7 n.29.