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May 7, 2015

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**VIA ELECTRONIC FILING COMMENT SYSTEM**

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

RE: Notice of Ex Parte Communication - *Rural Call Completion*, WC Docket 13-39 ; *Connect America Fund*, WC Docket 10-90

Dear Ms. Dortch:

On Wednesday, May 6, 2015, Robert W. McCausland, Vice President of Regulatory and Government Affairs, and Doug Davis, Chief Technology Officer, both of HyperCube Telecom, LLC (“HyperCube”); Lynn A. Stang, Vice President and Deputy General Counsel of West Corporation (parent company of HyperCube); Helen E. Disenhaus of Telecommunications Law Professionals PLLC participated in a conference call with Margaret S. Dailey of the Enforcement Bureau and Richard Hovey, Telecommunications Systems Specialist, of the Competition Policy Division of the Wireline Competition Bureau.

The discussion centered on the difficulty of tracing the calling party in situations in which a call terminating on the Public Switched Network (“PSTN”) has incomplete call signaling information passed from the originating provider or removed or otherwise obscured by subsequent providers in the call path. HyperCube noted that this poses difficulties for identifying the source of problems associated with completing calls to rural locations; for identifying the correct jurisdiction of calls for accurate access charge assessments; for providing responses to requests from law enforcement officials (which may be particularly time-sensitive in such situations as telephone bomb threats to schools and other public places); and for providing regionalized routing and accurate information to public safety organizations such as poison control centers (which are reached via “800” numbers rather than 911) and commercial entities which take advantage of this aspect of toll free numbers.

To minimize future situations in which call signaling information isn’t presented or is removed by providers, HyperCube requested that the Enforcement Bureau issue an Enforcement Advisory reminding providers of services of their obligation under the Commission’s Rules to fully populate call signaling information, including passing the CN associated with the calling party. While this may not eliminate all instances in which this information is not provided, it would remove any doubt on the part of some



Ms. Marlene H. Dortch, Secretary  
May 7, 2015  
Page 2

providers that they are required to provide this data, and would put all providers, regardless of technology, on notice of their obligations.

The participants also discussed the benefits of recommending that carriers regularly populate an empty charge number field with the appropriate BTN when no CN or ANI is present in order to facilitate rapid resolution of Rural Call Completion, Law Enforcement, and Public Safety situations. This would allow public safety agencies and carriers to identify the network from which a call originated, or at least the network from which it first accessed the PSTN, and thus this procedure would substantially expedite efforts to determine the originating network in many critical time-sensitive situations. In this connection, the parties also discussed the benefits of identifying population of the CN field with the BTN as a recommended approach in some cases.

HyperCube also noted that there had been no action to date on HyperCube's Petition for Limited Waiver of the Commission's Call Signaling Rules filed in WC Docket No. 10-90 on June 28, 2012.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office, and a copy of this submission is being provided to the meeting attendees.

Please direct any questions as to this matter to the undersigned.

Very truly yours,

/s/ Helen E. Disenhaus

Helen E. Disenhaus  
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

Cc (via e-mail):           Richard Hovey (WCB)  
                                  Margaret S. Dailey (EB)

## Your submission has been accepted

<b>ECFS Filing Receipt</b>	
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<b>Proceedings</b>	
Name	Subject
13-39	Rural Call Completion
10-90	In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support . .
<b>Contact Info</b>	
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