



January 7, 2016

***Ex Parte Notice***

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

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

Dear Ms. Dortch:

On Tuesday, January 5, 2016, the undersigned and Jill Canfield, Vice President – Legal & Industry and Assistant General Counsel, met with Megan Capasso, Richard Hovey, Daniel Kahn, and Vickie Robinson from the Competition Policy Division of the Wireline Competition Bureau to discuss matters in the above-referenced proceeding.

We first inquired about the status of any review by the Federal Communications Commission (the “Commission”) of reports filed by providers last year with respect to rural call completion monitoring. We urged the Commission to use those reports as a diagnostic tool to identify and move toward elimination of problematic rural call completion practices, to publicize to the extent practical and permissible any relevant data points and trends detected arising out of review of those reports, and to educate all stakeholders on further steps that might be taken to enable more effective use and validation of the data contained within those reports.

NTCA next discussed the continuing need to capture data with respect to calls completing or failing to complete to consumers served by competitive local exchange carriers in rural areas. As an absolute matter of law and policy, it should not matter whether a consumer is served by an incumbent or a competitor – a duty exists, as previously articulated by the Commission, to complete every call. But the current reporting requirements capture only calls to consumers served by incumbent carriers, frustrating efforts to identify, understand, and ultimately address concerns that continue to arise as calls fail to complete to competitively served rural customers. NTCA discussed how the Commission might be able to capture data showing which carriers serve rural customers and thereby enable a more effective dialogue and response among industry stakeholders when problems arise in completing calls to such consumers.

Marlene H. Dortch

January 7, 2016

Page 2 of 2

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President – Policy

cc: Megan Capasso  
Richard Hovey  
Daniel Kahn  
Vickie Robinson