

**PHANTOM TRAFFIC
CC Docket 01-92**

Today a significant and growing portion of call traffic delivered to rural ILEC networks over common trunk groups is unbillable because the identity of the company originating the traffic is unknown or the rural ILEC does not have an interconnection agreement with the originating carrier. If the Commission does not adopt rules that allow rural ILECs to receive equitable payments from these carriers for the cost they impose on rural ILEC networks, the sustainability of their networks and affordability of rates to rural consumers may be jeopardized. NTCA therefore supports the section of the EPG proposal that recommends that the Commission, after a date certain, require all unlabeled traffic be billed to the carrier at the other end of the trunk group on which the traffic arrives as access. And, in cases where the rural ILEC does not have an existing interconnection agreement with the carrier responsible for the traffic, the Commission should establish equitable default termination rates.¹

NTCA further recommends that the Commission consider new alternatives for identifying traffic in the future. For example, in January 2005, the Network Interconnection Interoperability Forum (NIIF) released procedures for getting accurate geographic information for call origination into Signal System 7 (SS7) initial address messages (IAM). Wireless and wireline operators and equipment manufactures and other industry forum coordinated to implement existing Jurisdictional Information Parameter (JIP), a six digit field to populate SS7 IAMs. Currently, JIP is an optional parameter to convey geographic information about the location of the calling party. The NIIF recommends seven rules that will provide the actual location of the caller, thus enabling more accurate routing through interLATA and intraLATA lines, as well as more accurate information for billing between carriers.

The seven rules for JIP population proposed by the NIIF² include the following:

1. JIP should be populated in the IAMs of all wireline and wireless originating calls where technically feasible.
2. JIP should be populated with an NPA-NXX that is assigned in the LERG to the originating switch or Mobile Switching Center (MSC).
3. The NIIF does not recommend proposing that the JIP parameter be mandatory since calls missing any mandatory parameter will be aborted. However, the NIIF

¹ EPG Proposal, p. 18.

² *Improving Interconnection Between Wireless and Wireline Carriers*, The evolution of number portability and roaming have obsolete calling directory numbers as the only information on top of which routing, rating and billing decisions are based. The solution may lie in evolving from just relying on phone numbers to also including geographic parameters. BILLING WORLD AND OSS TODAY, Standards Watch, February 2005, pp. 30-31.

strongly recommends that the JIP be populated on all calls where technically feasible.

4. Where technically feasible if the originating switch or MSC serves multiple states/LATAs, then the switch should support multiple JIPs such that the JIP used for a given call can be populated with an NPA-NXX that is specific to both the switch as well as the state and LATA of the caller. If the JIP cannot be populated at the state and LATA level, the JIP should be populated with an NPA-NXX specific to the originating switch or MSC where it is technically feasible.
5. Where the originating switch cannot signal JIP it is desirable the subsequent switch in the call path populate the JIP using a data fill default associated with the incoming route. The value of the data fill item is an NPA-NXX associated with the originating switch or MSC and reflects its location.
6. When call forwarding occurs, the forwarded call from directory number (DN) field will be populated, the JIP will be changed to a JIP associated with the forwarded from DN and the new called DN will be inserted in the IAM.
7. As per T1.TRQ2, the JIP should be reset when a new billable call leg is created.

According to the NIIF, the JIP standard would be able identify a Bostonian in California making a call on a cell phone with a Boston NPA-NXX and provide the billing information on the area from which the call originated and the telephone number assigned to the originating carrier. This information would improve the rating and routing of the calls, as well as accurate billing information for the company terminating the call. The NIIF recognizes that the Commission has yet to decide whether it will treat VoIP traffic differently or the same as traditional voice traffic. The NIIF, however, also believes that VoIP JIP will be able to populate information on VoIP calls to ensure rating, routing, and blocking are accurate with IP telephony.³

NTCA believes accurate information for billing purposes is a vital piece of any new set of interconnection rules. Specific rules requiring all carriers, including intermediate carriers, to pass along information to enable accurate billing will reduce litigation and the administrative burdens on carriers and the Commission. NTCA therefore recommends that the Commission as part of its rules in this proceeding consider adopting the JIP rules and require all unlabeled traffic to be billed to the carrier at the other end of the trunk group on which the traffic arrives as access traffic. In addition, in cases where a rural ILEC does not have an existing interconnection agreement with the carrier responsible for the traffic, but is able to identify the carrier originating the traffic, the Commission should establish new equitable default termination rates.

³ *Id.*, p. 31.