



Independent Telephone & Telecommunications Alliance

Phantom Traffic

Developing a Unified Intercarrier Compensation Regime
CC Docket No. 01-92

March 2008



Mid-size companies have supported constructive approaches

- Greater accountability for use of the network is needed in order to protect consumers and ensure network viability longer term
- Mid-Size carriers/ITTA have been active in promoting understanding of the problem and potential solutions





Mid-size companies actively propose viable solutions

- Numerous comments in Inter-carrier Compensation docket
- Multiple *ex parte* presentations and meetings with Commissioners' offices and Bureau
- Specific, actionable proposal filed December 2005
 - Specific rules
 - Jurisdictional basis





Mid-size carriers have worked toward industry consensus

- Modified proposal filed March 2006 based on further industry discussions
- Efforts intended to support prompt and focused Commission action





Prompt FCC action encouraged

- The FCC should quickly adopt Federal rules to:
 - Reduce anti-competitive arbitrage
 - Enable capture of revenues supporting networks
 - Safeguard consumers
 - Establish a basis for comprehensive ICC reform
 - *Affirms principle that users of the network should pay for the network*





Mid-size carriers support equitable solutions

- The USTelecom proposal is a logical and equitable solution
 - would apply to non-common carriers
 - would not be limited to SS7
- Requires transmission of telephone number received from or assigned to calling party
- Prohibits disguising of traffic
- Clarifies N-1 party responsible for LNP queries
- Urges Commission enforcement





Conclusion

- Phantom traffic will continue to increase absent specific rules to resolve the problem
- The FCC has the jurisdiction, the record, and specific proposals to enact rules to resolve phantom traffic now
- The Commission should move quickly to enact clear and enforceable labeling and routing rules

