

GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

ELIZABETH S. JACOBS, CHAIR
DARRELL HANSON, BOARD MEMBER
SWATI A. DANDEKAR, BOARD MEMBER

December 2, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Michael J. Copps
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Robert M. McDowell
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Mignon Clyburn
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: October 18, 2011, FCC Rural Call Completion Workshop

In the Matter of the Connect America Fund, WC Docket No. 10-90; National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High Cost Universal Service Support, WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Chairman Genachowski and Commissioners:

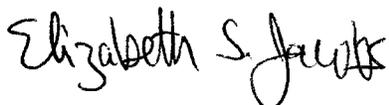
The Iowa Utilities Board writes this letter in support of the December 1, 2011, state commission letter signed by the Nebraska Public Service Commission, Missouri Public Service Commission, Minnesota Public Utilities Commission, Montana Public Service Commission, South Dakota Public Service Commission, Michigan Public Service Commission, and Wyoming Public Service Commission regarding the problem of failed call completions in rural areas. While the Board has not formally investigated this matter, it is the Board's understanding that this is primarily an interstate problem associated with the use of least-cost routing for interexchange traffic. This letter is addressed only to the interstate jurisdiction and your jurisdiction; at this time the Board has no position regarding any possible intrastate call completion problems.

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With that understanding, the Board supports the December 1, 2011, state commission letter and its request for a declaratory order that reaffirms two principles under federal law. First, carriers are responsible for the completion of interstate calls that are originated by their customers. Second, if an originating carrier is found not to be performing its terminating responsibility, the FCC should take prompt and effective enforcement action, including significant levels of forfeitures, as a means to correct the epidemic call completion problem confronting rural areas of the country.

We appreciate the opportunity to address this issue.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth S. Jacobs". The signature is written in a cursive style with a large, prominent "E" and "J".

Elizabeth S. Jacobs
Chair
Iowa Utilities Board