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May 21, 2012

Ex Parte Notice

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

***Establishing Just and Reasonable Rates for Local Exchange Carriers,* WC Docket No. 07-135; *Developing* a *Unified Intercarrier Compensation Regime,* CC Docket No. 01-92; *Rules and Regulations Implementing the Truth in Caller ID Act of 2009,* WC Docket No. 11-39**

Dear Ms. Dortch:

On Thursday May 17, 2012 the undersigned and Bob Gnapp on behalf of the National Exchange Carrier Association (NECA) together with Jill Canfield from the National Telecommunications Cooperative Association (NTCA), Steve Pastorkovich from the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) and Derrick Owens from the Western Telecommunications Alliance (WTA) (collectively, Rural Representatives) met with Terry Cavanaugh, Margaret Dailey and Chris Killion from the Enforcement Bureau, and Bill Dever and Richard Hovey of the Wireline Competition Bureau to discuss results of the recent national call completion test conducted by NECA.

In particular, the group discussed the rationale behind the test call project, its history, comparisons with our September 2011 test, and the results of the current test. The current test included over 7400 call attempts compared with 2150 call attempts last Fall. Test calls were originated by volunteers located in rural and non-rural locations in 34 states and terminated to 115 rural and non-rural test lines located in 40 states, covering 60 separate LATAs.

Our current test shows overall completion and quality problems have improved since our September 2011 test. The Rural Representatives however, expressed concern over two key areas. First, call completion issues in rural areas are still at unacceptable levels.

Overall incompletion rates for calls placed to rural test lines were 13 times higher than the incompletion rates for calls placed to non-rural test lines. Of the 100 rural telephone lines tested, 20% of calls did not go through at all, while an even greater percentage experienced call quality issues.

Second, we fear this improvement may be a temporary response to recent FCC activity including the Clarification Order which went into effect December 29, 2011 or a planned response to the Rural Association's pre-announced test call project itself. While it is encouraging to see dramatic increases in call completion rates among interexchange carriers, we hope this trend continues to improve. The Rural representatives were asked to give reasons for the improvement. Exact reasons are unclear but may be due to improvements in error detection and least cost routing practices or designating more reliable routes.

Wireless providers showed little improvement in call completion rates from our September 2011 test with at least one carrier making dramatic improvements. Fixed VoIP providers showed an improvement in completion rates but an increase in call quality issues. Nomadic VoIP providers also showed overall improvement, but maintain an unacceptably high overall call incompletion rate of 30% and "total issues" rate greater than 50%.

The Rural Representatives plan to share test call reports with ATIS and discuss follow-up test call efforts involving ATIS membership. Upon request, NECA will provide tested carriers and providers call detail associated with all calls using their service to allow troubleshooting within provider's network. Test call participants (both call originators and test line owners) were encouraged to open trouble tickets with originating carriers. In cases where efforts to resolve the call completion issue with the originating carrier have failed to produce a long term positive outcome, companies will be encouraged to report this information to rccinfo@fcc.gov.

Correspondence giving examples of public safety and economic impacts were discussed and shared with Commission staff. Versions with personal information redacted are attached. Also discussed were ways to best report and improve the complaint data submitted by rural telephone companies.

The Associations expressed thanks for the recent efforts taken by the FCC to address rural call completion issues including its Rural Call Completion Workshop, increased coordination with industry and state commissions and ongoing investigations by the Enforcement Bureau into the causes and practices at the heart of the rural call completion issue. We also urged the task force to remain diligent in its efforts.

The Rural Representatives responded to several questions presented by FCC staff regarding the attached summary of NECA's test call project. This summary was provided to Commission staff to facilitate this discussion and includes carrier identifying information that NECA requests to remain confidential; a redacted copy is attached, and a confidential version is provided under seal.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (202) 682-2496 or csandy@neca.org.

Sincerely,

Attachments

cc: Terry Cavanaugh
Margaret Dailey
Chris Killion
Bill Dever
Richard Hovey