

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A 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
	)	
<u>Universal Service Reform – Mobility Fund</u>	)	WT Docket No. 10-208

**REPLY COMMENTS OF THE ALASKA RURAL COALITION REGARDING  
PETITION FOR LIMITED WAIVER OF THE COMMISSION’S CALL SIGNALING  
RULES**

## **I. Introduction.**

The Alaska Rural Coalition<sup>1</sup> (“ARC”) hereby responds to comments filed regarding its Petition for a limited waiver of the new call signaling rules issued by the Federal Communications Commission (“Commission”) on November 18, 2011 in the *USF/ICC Transformation Order* (“*Transformation Order*”).<sup>2</sup> The new call signaling rules intended to remedy the issue of phantom traffic, but for rural and remote Alaska the solution overwhelms the problem. Wherever technically and practically feasible, the ARC companies will comply with the call signaling rules, but where existing network limitations make compliance infeasible, the ARC member companies respectfully request a waiver of the Commission rules contained in 47 C.F.R. § 64.1601(1)-(2).

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<sup>1</sup> The ARC is composed of Alaska Telephone Company, Alaska Power & Telephone, Inc., Alaska Power & Telephone Long Distance, Inc., Arctic Slope Telephone Association Cooperative, Inc., Arctic Slope Telephone Association Cooperative Long Distance LLC, Bettles Telephone, Inc., Bristol Bay Cellular Partnership, Bristol Bay Telephone Cooperative, Inc., Bush-Tell, Inc., Circle Telephone & Electric, LLC, Cordova Telephone Cooperative, Inc., Cordova Wireless Communications, Inc., Copper Valley Telephone Cooperative, Inc., Copper Valley Wireless, Inc., Copper Valley Long Distance, Inc., City of Ketchikan, Matanuska Telephone Association, Inc., Interior Telephone Company, Mukluk Telephone Company, Inc., MTA Communications, LLC d/b/a MTA Wireless, MTA Communications, LLC d/b/a MTA Long Distance, North Country Telephone Inc., Nushagak Electric and Telephone Company, Inc., OTZ Telephone Cooperative, Inc., OTZ Telecommunications, Inc., The Summit Telephone and Telegraph Company, Inc., TelAlaska Long Distance, Inc., and Yukon Telephone Company, Inc.

<sup>2</sup> See *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for our Future*, 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, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*Transformation Order*” and “*FNPRM*”).

## **II. The Commission Should Grant the ARC's Requested Waiver With No Additional Obligations.**

As discussed in our Petition, in Remote Alaska, infrastructure challenges, financial constraints and technological issues have precluded a universal adoption of SS7 for signaling. Most of the rural ILECs operating in Alaska have some component of their network that does not comply with the Commission's revised signaling requirements.<sup>3</sup> CenturyLink<sup>4</sup> and the Rural Associations<sup>5</sup> offered comment regarding the ARC's Petition for a Limited Waiver. Neither objected to the ARC's Petition for a limited waiver, but both expressed some concern that the scope of a waiver remain limited in nature.

CenturyLink supported the ARC's waiver request, but suggested that additional information should be requested regarding signaling related to VoIP-PSTN traffic.<sup>6</sup> The ARC has little detail to provide at this time. The incorporation of IP technology into the existing network has created some situations where adequate ANI information is not passed to the terminating rural carrier. Whether this traffic comes to the ARC member directly from a VoIP carrier or from ACS, who has reported the problem, the rural carrier cannot technically comply and requires a limited waiver. The ARC does not expect this to develop into a rampant problem as the transition to an IP network will likely take substantial time in Remote Alaska. The ARC appreciates CenturyLink's conclusion that the ARC should not be required to provide substantial

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<sup>3</sup> See 47 C.F.R. § 64.1601(a)(1)-(2).

<sup>4</sup> See Comments of CenturyLink on the ARC's Petition for Limited Waiver of the Commission's Call Signaling Rules (filed May 4, 2012).

<sup>5</sup> See Comments of the National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, Western Telecommunications Alliance and National Exchange Carrier Association ("Rural Associations") on the ARC's Petition for Limited Waiver of the Commission's Call Signaling Rules (filed May 4, 2012) .

<sup>6</sup> See CenturyLink Comments at 3.

data as a prerequisite to receiving a Commission waiver. “To be clear, CenturyLink is not suggesting that lists of switches or extensive detailing regarding the amount of traffic and the like are required.”<sup>7</sup>

The Rural Associations were likewise supportive of the ARC’s waiver request.<sup>8</sup> The proffered support was coupled with a suggestion that the ARC make a significant filing to further support its Petition. The ARC does not believe that providing an exhaustive list of affected switches would provide useful data to the Commission given the interdependency of the Alaska network. It would likewise be difficult for the ARC companies to “ensure” that Alaska interexchange carriers (“IXCs”) provide adequate signaling information.<sup>9</sup> The ARC believes that Alaska IXCs, including affiliates of ARC companies, currently provide the information allowed by existing signaling technology. The ARC is unaware of any evidence in the record to support the Rural Association’s concern that lower 48 carriers currently receive a material amount of calls originated in Alaska that lack adequate information to audit Percent Interstate Usage and/or call records.<sup>10</sup>

The Rural Coalition recognizes and appreciates the diligence of CenturyLink and the Rural Associations regarding signaling waivers. The concerns raised in their respective comments reflect important issues in the Lower 48, but as demonstrated in the reply comments of GCI, ACS and the Alaska Rural Coalition, those concerns are largely inapplicable to Alaska.

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<sup>7</sup> CenturyLink Comments at 3.

<sup>8</sup> See Rural Associations Comments at 2.

<sup>9</sup> See Rural Associations Comments at 6.

<sup>10</sup> See Rural Associations Comments at 6.

