EX PARTE OR LATE FILED

NECA

1634 Eye Street NW
Suite 510
Washington, D.C. 20006

Colin Sandy
Government Relations Counsel
PH 202-682-2496
FX 202-682-0154
csandy@neca.org

May 21, 2012

FILED/ACCEPTED

MAY 21 2012

Federal Communications Commission
Office of the Secretary

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.

No. of Copies rec'd 0+1
List ABCDE

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

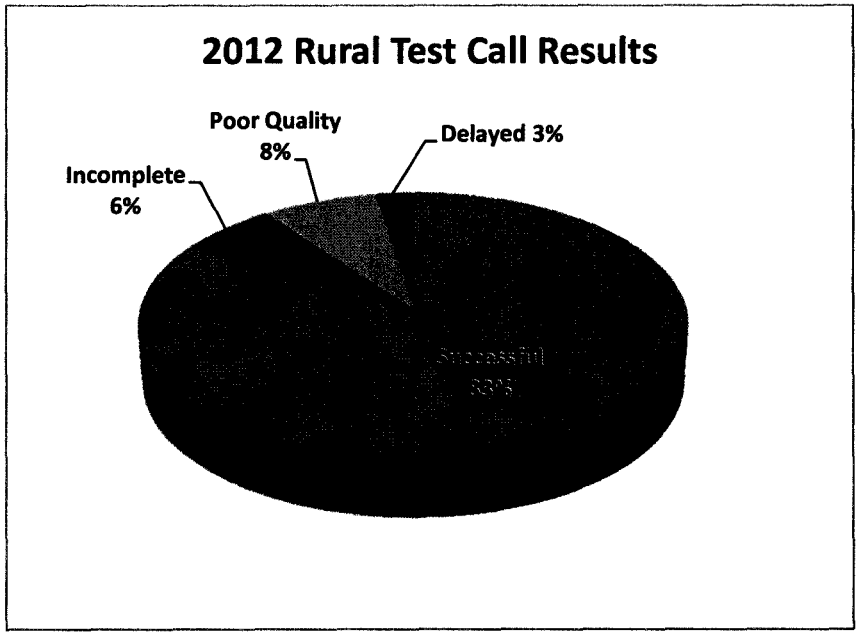
National Call Completion Test - April 2012

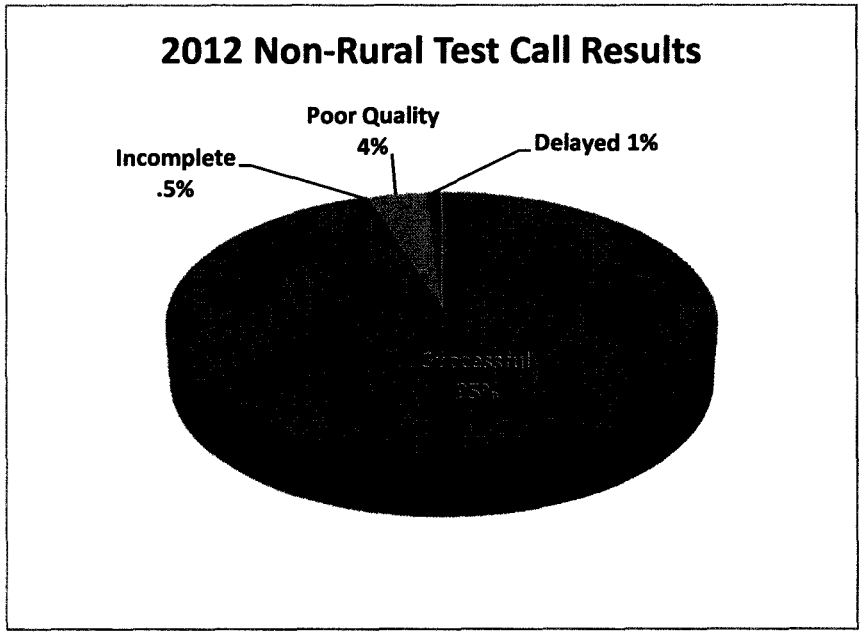
Summary by Service Type

	2012 RURAL				2012 NON-RURAL				RURAL	NON-RURAL
Service Type	Attempts	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Attempts	Incomplete Calls	Poor Voice Quality	Delayed Setup*	**Total Issues**	**Total Issues**
IXC	4,037	3.5%	5.3%	2.8%	341	0.6%	1.5%	0.6%	11.6%	2.6%
Wireless	1,162	4.3%	9.0%	1.3%	102	1.0%	8.8%	1.0%	14.5%	10.8%
VoIP-Fixed/Cable	991	6.4%	6.5%	3.0%	84	0.0%	1.2%	2.4%	15.8%	3.6%
VoIP-Nomadic	634	28.4%	21.8%	1.4%	54	0.0%	13.0%	1.9%	51.6%	14.8%
Totals	**6,824**	**6.4%**	**7.6%**	**2.5%**	**581**	**0.5%**	**3.8%**	**1.0%**	**16.5%**	**5.3%**

NOTES:

* Calls were recorded as "Delayed Setup" when ring-back began after 15 seconds or more of dead air following dialing. Such calls may have also resulted in incompletion or poor voice quality; to avoid double counting, these calls are only counted as "Incomplete" or "Poor Voice."





National Call Completion Test - April 2012

Summary by Carrier

		2012 RURAL				2012 NON-RURAL				RURAL	NON-RURAL
Carrier	Service Type	Attempts	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Attempts	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Total Issues	Total Issues
Carrier Name Redacted	IXC	932	5.4%	7.2%	5.6%	78	0.0%	1.3%	1.3%	18.1%	2.6%
Carrier Name Redacted	IXC	843	1.7%	4.2%	1.9%	72	0.0%	1.4%	0.0%	7.7%	1.4%
Carrier Name Redacted	IXC	284	4.9%	7.0%	1.4%	24	0.0%	0.0%	0.0%	13.4%	0.0%
Carrier Name Redacted	IXC	68	4.4%	26.5%	0.0%	6	0.0%	0.0%	0.0%	30.9%	0.0%
Carrier Name Redacted	IXC	212	1.4%	1.9%	0.9%	18	0.0%	0.0%	0.0%	4.2%	0.0%
Carrier Name Redacted	IXC	70	11.4%	5.7%	7.1%	6	0.0%	0.0%	16.7%	24.3%	16.7%
Carrier Name Redacted	IXC	106	7.5%	8.5%	5.7%	6	0.0%	0.0%	0.0%	21.7%	0.0%
Carrier Name Redacted	IXC	141	5.0%	5.0%	1.4%	12	0.0%	0.0%	0.0%	11.3%	0.0%
Carrier Name Redacted	IXC	496	1.6%	5.8%	2.2%	41	2.4%	2.4%	0.0%	9.7%	4.9%
Carrier Name Redacted	IXC	70	2.9%	1.4%	0.0%	6	0.0%	0.0%	0.0%	4.3%	0.0%
Carrier Name Redacted	IXC	69	5.8%	4.3%	5.8%	6	0.0%	0.0%	0.0%	15.9%	0.0%
Carrier Name Redacted	IXC	608	2.6%	1.5%	1.5%	54	1.9%	1.9%	0.0%	5.6%	3.7%
Carrier Name Redacted	IXC	66	1.5%	1.5%	0.0%	6	0.0%	0.0%	0.0%	3.0%	0.0%
Carrier Name Redacted	IXC	72	5.6%	8.3%	5.6%	6	0.0%	16.7%	0.0%	19.4%	16.7%
IXC Totals		**4,037**	**3.5%**	**5.3%**	**2.8%**	**341**	**0.6%**	**1.5%**	**0.6%**	**11.6%**	**2.6%**
Carrier Name Redacted	Wireless	424	1.9%	5.7%	0.5%	36	2.8%	11.1%	0.0%	8.0%	13.9%
Carrier Name Redacted	Wireless	214	9.3%	1.4%	3.3%	18	0.0%	0.0%	5.6%	14.0%	5.6%
Carrier Name Redacted	Wireless	69	5.8%	10.1%	0.0%	6	0.0%	0.0%	0.0%	15.9%	0.0%
Carrier Name Redacted	Wireless	77	3.9%	14.3%	1.3%	12	0.0%	0.0%	0.0%	19.5%	0.0%
Carrier Name Redacted	Wireless	378	4.0%	15.6%	1.3%	30	0.0%	16.7%	0.0%	20.9%	16.7%
Wireless Totals		**1,162**	**4.3%**	**9.0%**	**1.3%**	**102**	**1.0%**	**8.8%**	**1.0%**	**14.5%**	**10.8%**
Carrier Name Redacted	VoIP-Fixed/Cable	285	7.7%	7.7%	3.9%	24	0.0%	4.2%	4.2%	19.3%	8.3%
Carrier Name Redacted	VoIP-Fixed/Cable	68	1.5%	1.5%	0.0%	6	0.0%	0.0%	0.0%	2.9%	0.0%
Carrier Name Redacted	VoIP-Fixed/Cable	72	2.8%	4.2%	2.8%	6	0.0%	0.0%	0.0%	9.7%	0.0%
Carrier Name Redacted	VoIP-Fixed/Cable	71	11.3%	2.8%	0.0%	6	0.0%	0.0%	0.0%	14.1%	0.0%
Carrier Name Redacted	VoIP-Fixed/Cable	281	6.0%	10.7%	5.7%	24	0.0%	0.0%	0.0%	22.4%	0.0%
Carrier Name Redacted	VoIP-Fixed/Cable	142	1.4%	1.4%	0.7%	12	0.0%	0.0%	8.3%	3.5%	8.3%
Carrier Name Redacted	VoIP-Fixed/Cable	72	15.3%	5.6%	0.0%	6	0.0%	0.0%	0.0%	20.8%	0.0%
VoIP-Fixed/Cable Totals		**991**	**6.4%**	**6.5%**	**3.0%**	**84**	**0.0%**	**1.2%**	**2.4%**	**15.8%**	**3.6%**
Carrier Name Redacted	VoIP-Nomadic	71	14.1%	23.9%	0.0%	6	0.0%	16.7%	0.0%	38.0%	16.7%
Carrier Name Redacted	VoIP-Nomadic	212	25.5%	38.7%	0.0%	18	0.0%	27.8%	5.6%	64.2%	33.3%
Carrier Name Redacted	VoIP-Nomadic	71	18.3%	15.5%	4.2%	6	0.0%	16.7%	0.0%	38.0%	16.7%
Carrier Name Redacted	VoIP-Nomadic	280	36.8%	10.0%	2.1%	24	0.0%	0.0%	0.0%	48.9%	0.0%
VoIP-Nomadic Totals		**634**	**28.4%**	**21.8%**	**1.4%**	**54**	**0.0%**	**13.0%**	**1.9%**	**51.6%**	**14.8%**
GRAND TOTALS		**6,824**	**6.4%**	**7.6%**	**2.5%**	**581**	**0.5%**	**3.8%**	**1.0%**	**16.5%**	**5.3%**

NOTES:

* Calls were recorded as "Delayed Setup" when ring-back began after 15 seconds or more of dead air following dialing. Such calls may have also resulted in incompletion or poor voice quality; to avoid double counting, these calls are only counted as "Incomplete" or "Poor Voice."

REDACTED - FOR PUBLIC INSPECTION

Carrier names redacted for public inspection.

2011 Test Call Results vs 2012 Test Call Results

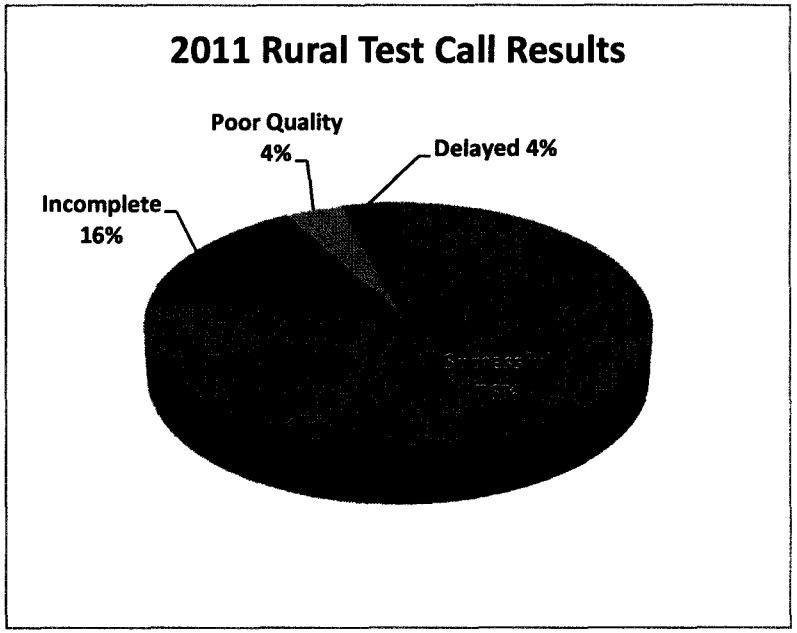
Summary by Service Type

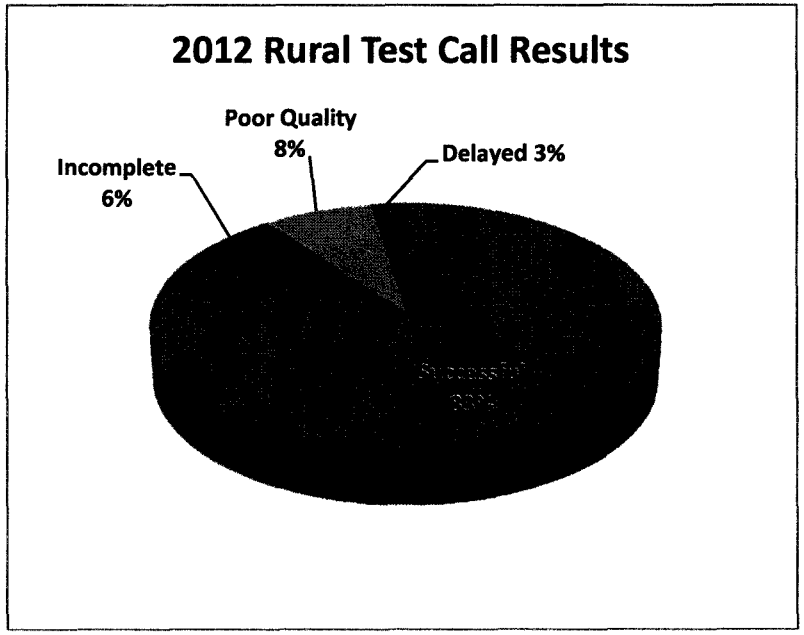
	2011 Rural			2012 Rural			Difference		
Service Type	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Incomplete Calls	Poor Voice Quality	Delayed Setup*
IXC	13.0%	5.0%	3.0%	3.5%	5.3%	2.8%	-9.5%	0.3%	-0.2%
Wireless	7.0%	3.0%	5.0%	4.3%	9.0%	1.3%	-2.7%	6.0%	-3.7%
VoIP-Fixed/Cable	18.0%	2.0%	0.0%	6.4%	6.5%	3.0%	-11.6%	4.5%	3.0%
VoIP-Nomadic	51.0%	13.0%	5.0%	28.4%	21.8%	1.4%	-22.6%	8.8%	-3.6%
Totals	**16.0%**	**4.0%**	**4.0%**	**6.4%**	**7.6%**	**2.5%**	**-9.6%**	**3.6%**	**-1.5%**

NOTES:

* Calls were recorded as "Delayed Setup" when ring-back began after 15 seconds or more of dead air following dialing. Such calls may have also resulted in incompletion or poor voice quality; to avoid double counting, these calls are only counted as "Incomplete" or "Poor Voice."

- This summary reflects overall results of all carriers tested in either 2011 or 2012. Not all carriers were tested both years.
- A list of carriers tested in both years is provided on the *2011 vs 2012 Summary by Carrier*.





2011 Test Call Results vs 2012 Test Call Results

Summary by Carrier

		2011 Rural			2012 Rural			Difference		
Carrier	**Service Type**	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Incomplete Calls	Poor Voice Quality	Delayed Setup*	Incomplete Calls	Poor Voice Quality	Delayed Setup*
Carrier Name Redacted	IXC	9%	0.9%	0.9%	5.4%	7.2%	5.6%	-3.6%	6.3%	4.7%
Carrier Name Redacted	IXC	14%	2.6%	8.6%	1.7%	4.2%	1.9%	-12.1%	1.6%	-6.7%
Carrier Name Redacted	IXC	12%	11.9%	1.9%	4.9%	7.0%	1.4%	-7.0%	-4.9%	-0.5%
Carrier Name Redacted	IXC	0%	3.6%	0.0%	7.5%	8.5%	5.7%	7.5%	4.9%	5.7%
Carrier Name Redacted	IXC	25%	3.1%	4.1%	1.6%	5.8%	2.2%	-23.4%	2.8%	-1.9%
Carrier Name Redacted	IXC	5%	8.8%	8.8%	2.6%	1.5%	1.5%	-2.9%	-7.3%	-7.3%
IXC Totals		**13%**	**5.1%**	**3.7%**	**3.4%**	**5.2%**	**3.0%**	**-9.9%**	**0.0%**	**-0.7%**
Carrier Name Redacted	Wireless	3%	1.1%	4.2%	1.9%	5.7%	0.5%	-1.3%	4.6%	-3.7%
Carrier Name Redacted	Wireless	1%	4.5%	11.2%	4.0%	15.6%	1.3%	2.8%	11.1%	-9.9%
Wireless Totals		**2%**	**2.7%**	**7.6%**	**2.9%**	**10.3%**	**0.9%**	**0.7%**	**7.6%**	**-6.7%**
Carrier Name Redacted	VoIP-Fixed/Cable	18%	2.0%	0.0%	6.0%	10.7%	5.7%	-12.3%	8.6%	5.7%
VoIP-Fixed/Cable Totals		**18%**	**2.0%**	**0.0%**	**6.0%**	**10.7%**	**5.7%**	**-12.3%**	**8.6%**	**5.7%**
Carrier Name Redacted	VoIP-Nomadic	40%	9.3%	9.3%	14.1%	23.9%	0.0%	-25.5%	14.6%	-9.3%
Carrier Name Redacted	VoIP-Nomadic	64%	3.4%	0.0%	25.5%	38.7%	0.0%	-38.3%	35.2%	0.0%
Carrier Name Redacted	VoIP-Nomadic	28%	6.5%	47.8%	18.3%	15.5%	4.2%	-10.0%	9.0%	-43.6%
VoIP-Nomadic Totals		**46%**	**6.1%**	**17.7%**	**21.8%**	**31.1%**	**0.8%**	**-23.8%**	**25.0%**	**-16.8%**
GRAND TOTALS		**16%**	**4.8%**	**5.7%**	**4.8%**	**8.3%**	**2.6%**	**-10.8%**	**3.6%**	**-3.1%**

NOTES:

* Calls were recorded as "Delayed Setup" when ring-back began after 15 seconds or more of dead air following dialing. Such calls may have also resulted in incompletion or poor voice quality; to avoid double counting, these calls are only counted as "Incomplete" or "Poor Voice."

- This summary reflects only the carriers tested in both 2011 and 2012.
- Totals on this summary do not match the totals on the *Summary by Service Type* , as additional carriers were tested in either year.

REDACTED - FOR PUBLIC INSPECTION

Carrier names redacted for public inspection.

JED Enterprises, Inc.
Pine Drive Telephone Co.

8611 Central Av. / PO Box 188
Beulah, CO 81023-0188
(719) 485-3400 (voice)
(719) 485-3500 (fax)
pdtelco@pinedrivetel.com

March 19, 2012

Doug Dean, Executive Director
Colorado Public Utilities Commission
1560 Broadway, Ste. 250
Denver, CO 80202

RE: Long Distance Call Termination Issues

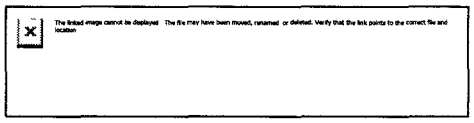
Dear Mr. Dean;

Please find enclosed a letter from a customer of mine that had a particularly unique and unsettling experience with the apparent failure of long distance carriers to terminate calls into rural areas. This issue highlights the public safety ramifications of this problem. Fortunately, no life was lost as a result of this failure of the network, but it could only be a matter of time.

I'm aware that the industry is working on this problem and the FCC has taken a stance, but the problem persists and attempted calling from the Denver area into my system seem to dominate the customer complaints I am receiving.

I ask that you share this with Chairman Epel and interested parties in the Commission and hope that this information will aid in the Commission's efforts to help resolve this issue.

Sincerely,



Richard J. Sellers
General Manager

Attachment: Memo from Steve Douglas dated 3/9/2012

Cc: Carol Brennan, NECA

TO: Mr. Dick Sellers, Pine Drive Telephone Company
FROM: Steve [redacted]
DATE: March 9, 2012
SUBJECT: Dropped long-distance calls - March 4, 2012

For the record, I live at [redacted], Beulah, Colorado. My home telephone number is [redacted]. I have been a Pine Drive Telephone Company customer for over 20 years and have always felt well served by your company. In the company's February and March, 2012 newsletters we have been made aware of a current problem related to termination of long-distance calls coming into Pine Drive's service area, i.e., calls being terminated before they ring to the intended telephone. The result leaves the caller with the impression that no one was picking up the phone and that the call was not going to voice-mail, and the intended recipient of that call was unaware of the effort because their phone did not ring.
I had an experience last Sunday (March 4, 2012) that appears to be the result of that long-distance call termination problem. I will describe that situation here in the hope that you can use the information to get the problem resolved, and I will do that because the impact of the situation goes well beyond me personally. It has public safety and potential life saving implications that should be taken seriously. It is my understanding that the problem is not with Pine Drive Telephone's equipment or process, but instead is related to other telephone service providers routing calls to numbers served by Pine Drive. If this is the case, the solution may require the attention of the Colorado Public Utilities Commission and/or the Federal Communications Commission.

I am one of nine search and rescue coordinators currently volunteering for the Colorado Search and Rescue Board. The Colorado Search and Rescue Board is a Colorado non-profit 501(c)(3) corporation that provides a point of contact for search and rescue matters on a state level. The board works closely with the State Division of Emergency Management (DEM) to fulfill several of DEM's statutory responsibilities regarding search and rescue.

The CSRB maintains a roster of search and rescue (SAR) resources throughout Colorado, and provides a Colorado Search and Rescue Coordinator, who is available 24/7 to assist local authorities in locating, and using additional or specialized resources. More information about CSRB can be obtained at its website, i.e., http://www.coloradosarboard.org/.

I am the coordinator on call this week, and was working on a search mission last Sunday, March 4, 2012. A man from the area of Norwood, Colorado was caught in an avalanche Saturday, while snowmobiling in the La Sal Mountains of eastern Utah. Search teams were attempting to locate and recover him, and contacted Colorado for assistance. Specifically, they were asking for an avalanche SAR dog team to assist in the process. Please understand that by Sunday, the mission was viewed more as a recovery than a rescue operation. Still, the dog team resources were being requested to speed up the process, both with victim care and responder safety in mind. (There were 50 searchers working to find him in the avalanche area.)

I was contacted at 11:16 am Sunday to assist in locating SAR resources to help on this mission. We rely heavily on land-line and cellular telephones to provide that assistance. Because of service at my residence, I rely on my cell phone ([redacted]) for initial notification from our 24-hour answering service, and then on my land-line ([redacted]) to place and receive calls. Those calls are typically within Colorado, except those involving the Air Force Rescue Coordination Center in Florida, which is instrumental in providing federal aircraft for SAR missions. There are approximately 60 SAR teams in Colorado and they are mostly organized geographically at the county level. Only a portion of those teams have their own SAR dog resources and only a portion of those dog resources are trained and certified for avalanche work. A big part of a CSRB coordinator's job is to find available and appropriate resources, brief them on the mission and assist them (if needed) in getting to the incident ... all in a timely manner. To do that, we network a lot. Search and Rescue Dogs of Colorado (SARDOC) is a group we depend on for finding available and appropriate dog resources.

I called SARDOC's answering service at 11:44 am Sunday and asked that their coordinator on call contact me regarding the need for an avalanche SAR dog team. I asked to be called back at my home phone. I continued to work the mission, calling various other SAR teams directly. At 12:21 I learned that Utah had cancelled their request for assistance from Colorado. (They recovered the missing gentleman about an hour later, buried under 12 feet of snow.) I proceeded to contact various teams that I had been speaking with, to let them know that our services were no longer needed. I contacted SARDOC's answering service with that update, although I had not heard from their coordinator, which was unusual. I made reference to that in my mission report, which was passed on to SARDOC. I was notified March 6th that, in fact, the SARDOC coordinator (Ms. Amy Ho) had tried unsuccessfully for over two hours Sunday to return my call.

I spoke with Ms. Ho yesterday about what did and did not happen Sunday. She indicated that she received a page to call me at 11:44 am and began attempting to return my call a couple of minutes later. She called me at [redacted] every 10-15 minutes for the next two or more hours. Each time, the phone rang for over a minute and then the call was terminated. She did not get a busy signal nor was she routed to my voice-mail. She placed calls to me using both her cell phone ([redacted]) and home phone ([redacted]). Those calls were placed from Longmont, Colorado. I was completely unaware of her attempts to call me Sunday, but I have no doubt that those attempts were made.

My experience with long-distance calls apparently being dropped before they got to my home phone Sunday did not influence the outcome of this SAR mission. Still, there is no guarantee that the next instance of calls being dropped will not hinder a mission, either in terms of the safety of the victim or the search and rescue personnel attempting to rescue or recover that victim. From what I understand, that issue is not limited to me and my phone service from Pine Drive Telephone; rather, it has the potential to impact any SAR coordinator or SAR team in rural Colorado that depends on service from a small telephone service provider. That is not a criticism of small companies, because they often provide the best or only available service. My experience with Pine Drive Telephone Company has been excellent, on all levels. I do ask for your assistance in getting this apparent problem resolved. Thank you.

1169 V PHONE COMP SEE 3/7/2011 9.36.00 AM MELANY

Result Verbiage: 28 called very upset about the ongoing incoming long distance troubles Miranda works from home and i s not able to keep her business going when clients cannot reach her by telephone Miranda also has a home in Forks, WA and is going to have to move her office there in order to continue her business Miranda is not able to get cell service from her home so moving is he r only option. Miranda's business partner cannot reach Miranda from any of his Spokane, WA offices or his cell phone. The calls ring an d drop off or just go to static right away. From one office he gets the message that he is not authorized to call this number. Miranda was in Spokane last week and tried to call her husband at home in Naselle from both her motel room and cell phone and could not reach the ir 360-4 8 number. Miranda is very upset about the situation and hates to move because of poor telephone service but sees this a s the only option.

1169 A CALL COMP SEE 2/28/2011 10:23:00 AM CAROL

Result Verbiage: 2-28-2011 3.The incoming Ld issues is causing her tremendous problems She works from home and c an't get her calls in that she needs to work. She was supposed to be on a conference call this morning that the caller has to initiate (sh e can't call into it) and they tried 5 times to contact her. The call would ring, but she couldn't answer it. She said this is totally unaccept able. There is no cell service where she lives so she is just absolutely unreachable Very unhappy and asks that we do whatever it tak es to get it fixed asap.

Report Area Totals:	3
Main Report Area Totals:	3
Company Totals:	3

09-19-2011 Nikki , Washington State Patrol 360 484-3130, called re their continuing incoming Ld problem. She has had about 15 calls in today that she can't answer. It rings, and then drops off. People have told her that they have called several times and the phone won't even ring. Some of the call attempts have been from cell phones in our local area, but since they are cell phones, they are also long distance calls, and they don't come in either.

9-20-2011. Nikki , Washington State Patrol, 360 484-3130. She said troopers have been calling her personal cell phone as they cannot reach the State Patrol office land line from their cell phones. She thinks their cell phones are US Cellular. She also said that she cannot reach her home telephone number nor the local school land land from her cell phone, which is also US Celluar. She has heard the same problem from the Eatons who said they cannot complete calls to the local telephone land line number from their cell phones. She thinks Eatons also have US celluar as their cell phone carrier. Nikki is very concerned about the number of calls that are rining into the state patrol office, and then drop off before she can answer.

10-12-11 Nikki from State Patrol Office called. She said she has had many calls drop today. She thought around 25. It is the inbound calls and if the calls do go through there's a big delay. Call example #1 360-473-0108 @ 2:20(this one had a terrible delay they tried 3 times). 2nd call example 360-596-4049 @ 10:00. The phone would ring Nikki couldn't hear anything but the lady emailed Nikki and told her she could hear her just fine. She tried several times before giving up and emailed Nikki instead.

11/2/11 Nikki, Washington State Patrol Office, 484-3130. Terminating call quality very bad today. Delays on all of the incoming calls. Cannot converse. Both on cell phones and land line phones. They have to call the customer back to be able to carry on a conversation. Outgoing LD works fine – Not being able to receive or understand incoming callers is a major safety issue. Nikki said she would e-mail the WUTC. She is very unhappy about the number of months (years) that this problem has been allowed to continue.