

September 5, 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 Tuesday, September 4, 2012, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), spoke via telephone with Randy Clarke and Rhonda Lien of the Wireline Competition Bureau regarding the potential interplay between traffic termination by Halo Wireless, Inc. (“Halo”) and broader rural call completion issues.

I noted NTCA’s understanding that most, if not all, traffic appears to have ceased as of early August 2012 to route through Halo to rural local exchange carriers, following the conversion of Halo’s bankruptcy case from Chapter 11 to Chapter 7 and related developments in those proceedings. I also explained that many NTCA members have experienced an increase in rural call completion problems in recent weeks. The downturn in Halo traffic and coinciding upward trend in an already alarming rate of call completion failures may indicate some correlation between Halo’s cessation as a least-cost routing option and the renewed use of other least-cost routers that are failing to complete calls (in lieu of Halo’s approach of delivering calls but then refusing to pay access charges for them). This highlights yet again that the “job is not done,” and that call completion problems will persist and are likely only to increase unless and until the Federal Communications Commission (the “Commission”) sends a clear signal that parties will actually be held liable for failing to deliver calls. NTCA therefore asserts yet again that it is essential for the Commission to demonstrate its commitment to the integrity of interconnected networks of all kinds by taking **public enforcement action** with respect to call completion failures.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or mromano@ntca.org.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano

Senior Vice President - Policy

cc: Randy Clarke
Rhonda Lien