



November 20, 2012

Marlene Dortch, Secretary
Federal Communications Commission
334 12th Street, SW
Washington, D.C.

Re: 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 a 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 Ms. Dortch:

On November 14th Betty Buckley, Executive Director of the Washington Independent Telecommunications Association (WITA) held separate meetings with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell and Nicholas Degani, Legal Advisor to Commissioner Pai, to discuss the continuing problem of call termination in rural areas. They also discussed particular challenges faced by Washington companies in implementing the recent Lifeline order.

Recent test calls and surveys of rural wireline telecommunications providers show that while there was a temporary decrease in the percentage of calls not being completed and calls completed with extremely poor call quality, these problems are once again increasing in frequency and severity. Several small WITA member companies participated in these tests and report up to 12% of calls to their service area do not complete while up to 17% complete with extremely poor call quality. Less than 5% of these calls were nomadic VoIP. This has resulted in a loss of revenue to many rural businesses and, more frighteningly, it continues to create public safety problems. During last winter's snow and ice storm in southwest Washington a State Patrol business office was unable to reach tow truck drivers to assist stranded motorists. Physicians in Spokane have difficulty reaching general practitioners in rural areas with essential test results. School districts have voiced concerns that they may be unable to reach parents in case of school closures or other emergencies.

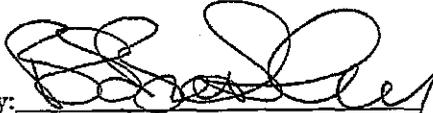
In addition to not completing calls some long distance carriers avoid access charges by delivering calls without proper caller identification codes. One WITA company reports that over 90% of the traffic to

their local tandem is actually long distance but does not contain sufficient billing information. Another company reports similar findings which they estimate results in \$1.2 M in lost revenue annually. The same is true, although to a somewhat lesser extent, to many other rural carriers in Washington State. This theft of access revenue puts an additional burden on the universal service fund.

Washington State has a Telephone Assistance Program (WTAP) administered by the Washington Department of Social and Health Services. WTAP does not consider itself a Lifeline program. The result of their decision, and the manner in which the Lifeline order was written, has forced Washington's telephone companies to administer two separate supported phone service programs. Households in Washington are permitted to have a Lifeline supported phone and a WTAP supported phone. WITA is looking for written guidance from the FCC that would reconnect the two programs thereby eliminating duplicate supported services.

Respectfully submitted,

WASHINGTON INDEPENDENT
TELECOMMUNICATIONS ASSOCIATION

By: 
Betty S. Buckley, Executive Director