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January 18, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92;
Establishing Just and Reasonable Rates for Local Exchange Carriers, WC
Docket No. 07-135

Dear Ms. Dortch:

On January 11, 2013, Andrew Fisher, Katherine Kirchner, Robert Munoz, and the undersigned of Comcast Corporation ("Comcast") met with William Dever and Richard Hovey of the Wireline Competition Bureau, and Terry Cavanaugh, Margaret Dailey, Chris Killion, and Theodore Marcus of the Enforcement Bureau.¹ The purpose of the meeting was to provide an overview of the procedures Comcast follows to ensure that our customers' calls to rural areas are delivered reliably and with the quality of service that our customers expect. In the course of that meeting, staff asked Comcast to provide additional information regarding certain aspects of Comcast's voice business. This letter provides that additional information.

Staff asked what percentage of calls routed to rural areas are carried by third party interexchange carriers and what percentage are delivered via direct connections between Comcast and the rural carrier. Approximately 18% of Comcast's long distance voice traffic to rural exchanges is delivered via direct connections to the rural carrier or through the access tandem the rural carrier subtends. The bulk of this traffic is intraLATA toll traffic exchanged over existing interconnection facilities established pursuant to local interconnection agreements.

Staff also asked whether Comcast prohibits its interexchange carriers by contract from injecting intermediate ringtone. Comcast is not aware that any of its interexchange carriers engage in this practice. Comcast's agreements with its interexchange carriers do not address this issue.

¹ See Letter from Mary McManus, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92 (Jan. 15, 2013).

Staff also asked whether Comcast could provide any performance benchmarks included in its contracts with its interexchange providers. Comcast explained in the meeting that, once an interexchange provider is selected by Comcast, Comcast, in consultation with the carrier, establishes performance metrics that are enforceable by Comcast. Comcast then actively monitors a carrier's performance against those metrics and meets regularly with each carrier to review their results, both in total and for rural routes. If during its monitoring Comcast sees metrics that are below prescribed levels for urban or rural traffic, Comcast requires the carrier to undertake immediate remedial actions on the affected route or routes. Otherwise, the carrier is removed from the route line-up. This approach provides Comcast with the flexibility to make route changes immediately and remove a carrier from the route line-up. Comcast will also remove a carrier from a route when it receives a trouble ticket from a wholesale customer. The carrier is not reinstated on that route until the carrier takes corrective action to address the problem.

Staff further asked whether Comcast's wholesale interexchange service offers a level of performance quality comparable to that which Comcast requires of the interexchange carriers it uses for its retail voice service. All of the interexchange carriers used by Comcast to provide wholesale interexchange service are also used by Comcast in support of its retail residential and business voice services customers. Accordingly, when a carrier's performance is measured against predefined metrics, both wholesale and retail traffic is used in the analysis.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this ex parte notification is being filed for inclusion in the public record of the above referenced proceeding.

Respectfully submitted,

/s/ Mary McManus

Mary McManus

cc: Terry Cavanaugh
Margaret Dailey
William Dever
Richard Hovey
Chris Killion
Theodore Marcus