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*EX PARTE* PRESENTATION

January 30, 2013

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

Re: *Developing an 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 28, 2013, Maggie McCready and Mark Montano, of Verizon, and Melissa Newman, Jeff Lanning and the undersigned, of CenturyLink, met with Nicholas Degani and Joshua Cox from the Office of Commissioner Pai. The purpose of the meeting was to discuss the respective views of Verizon and CenturyLink on next steps that may be taken to address the issue of long distance call completion in the local exchanges of rural local exchange carriers (RLECs).

Both companies noted the efforts that they have taken to work with RLECs to address rural call completion customer complaints and respond to information inquiries from the Commission. The Commission representatives were advised of work being done by the Alliance for Telecommunications Industry Solutions (ATIS) to address rural call completion issues, including working collaboratively with rural associations through ATIS's Next Generation Interconnection Interoperability Forum on possible future call completion testing.<sup>1</sup> We discussed actions initiated by state public utility commissions concerning rural call completion and suggested a coordinated, uniform approach. Mutual support was expressed for identifying a process that would allow the Commission to quantify, in appropriate context, the magnitude of any rural call completion issues and identify their root cause(s). Concern was voiced about the adoption of unduly burdensome data collection and reporting obligations that would not help the Commission achieve these objectives.

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<sup>1</sup> See *ATIS Leads Initiative to Address Call Completion Rates in Rural Areas; Publishes Handbook Containing Best Practices*, September 4, 2012, <http://www.atis.org/PRESS/pressreleases2012/090412.html>. See also November 15, 2012, *Ex Parte* Notice filed by NECA in *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing an 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.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* presentation is being filed for inclusion in the records of the above-referenced proceedings.

Sincerely,

/s/ Lawrence E. Sarjeant

Copy via e-mail to:  
Nicholas Degani  
Joshua Cox