



Brian Benison  
Director  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036

T: 202.457.3065  
F: 202.457.3070

September 30, 2013

**Electronic Submission**

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

Re: ***Rural Call Completion, WC Docket No. 13-39***

Dear Ms. Dortch:

On September 26th, Christi Shewman, Penn Pfautz and I of AT&T Services, Inc. met with Lisa Gelb, Bill Dever, Carol Simpson, Jean Ann Collins, Steve Rowings, Richard Hovey and Greg Kwan of the Wireline Competition Bureau and Chris Killion and Margaret Dailey of the Enforcement Bureau. During the meeting, we discussed the issue of rural call completion and the challenges connected with reprogramming TDM switches to collect data that AT&T does not generally track today. We also noted that AT&T makes very limited use of alternative providers and works hard to complete calls regardless of jurisdiction and urged the staff to ensure that carriers who are willing to meet the safe harbor should be exempted from any data retention related to call completion.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

cc: Lisa Gelb  
Bill Dever  
Carol Simpson  
Jean Ann Collins  
Steve Rowings  
Richard Hovey  
Greg Kwan  
Chris Killion  
Margaret Dailey