



October 22, 2013

**Ex Parte**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: WC Docket No. 13-39

Dear Ms. Dortch:

This is to inform you that on October 18, 2013, Jonathan Banks and Glenn Reynolds of USTelecom met with Rebekah Goodheart, Legal Advisor to Acting-Chairwoman Clyburn, and Travis Litman of the Wireline Competition Bureau in connection with the docket identified above.

In this meeting, we discussed various approaches the Commission could take to identify and address the causes of rural call completion problems. We expressed concern that the proposed order on circulation, which we understand focuses on extensive industry data collection, may not lead to behavioral changes in the near future that would reduce the percentage of uncompleted calls to rural exchanges. We urged that the Commission consider modifying the proposal to create incentives on the part of inter-exchange carriers to implement and comply with industry best practices for call routing and completion, such as through the use of safe harbors. We noted that the Alliance for Telecommunications Industry Solutions (ATIS) has compiled the Intercarrier Call Completion / Call Termination Handbook that identifies potential Best Practices that may be useful in addressing call completion problems.

Please do not hesitate to contact me with any questions concerning this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Reynolds".

Glenn Reynolds  
Vice President, Policy

c: Rebekah Goodheart  
Travis Litman