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October 24, 2013

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

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

Dear Ms. Dortch:

Frontier Communications takes seriously its call completion obligations. As a carrier that has experienced calls failing to terminate to its own customers, Frontier knows first-hand how frustrating and important this issue is for customers and the terminating carrier. While Frontier supports the Commission's efforts to ensure rural call completion, Frontier wishes to reiterate the extreme burdens of the Commission's proposed record retention requirements.¹ These burdens can be alleviated by adopting common sense proposals already found in the record of this docket.

Frontier's comments in this docket detail that the Commission's proposed record retention rules would prove technologically difficult to implement² and costly not only in their implementation but on an ongoing basis as well.³ In a recent *ex parte* CenturyLink provided a detailed estimate of the costs associated with the Commission's proposed requirement:

CenturyLink estimates that a carrier could incur costs of \$7.5 million to \$10.5 million to set up the storage hardware, develop the reporting, and pay the requisite license fees to meet the proposed requirements under consideration by the Commission. Data storage of the magnitude under

¹ *In re: Rural Call Completion*, WC Dkt. Nos. 13-39, *Notice of Proposed Rulemaking*, FCC 13-18, at Appendix A §64.2103 (rel. Feb. 7, 2013) ("*NPRM*").

² Comments of Frontier Communications Corp., WC Dkt. No. 13-39 (filed May 13, 2013) at 8 ("Frontier already retains six of the eight proposed data points, yet the two that are not industry standard—the information on intermediate providers and the information on whether the called party was assigned to a rural telephone company—would prove difficult to implement, particularly when layered with other complexities found in the *NPRM*. The information on intermediate providers would be difficult to record. While Frontier can identify which provider it handed the call to, this is not currently a standard item for retention and would require significant technological changes to standardize this practice. The indication of whether the called party number was assigned to a rural telephone company would also require either a new reference look-up or new technology.").

³ *Id.* ("The implementation of these changes is made much more onerous by the Commission's proposal to require carriers to retain this information for six months. Frontier processes a tremendous volume of long distance calls daily and requiring retention of each call sent to a rural OCN, of which there are 1,351 on the Commission's proposed rural OCN list, is a massive amount of information to store. These changes would require new software to record and hardware to store the information, as well as devoting significant personnel resources to implementing the technological changes.").

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consideration in this proceeding, even if limited to a three month cycle, would range from \$2.8 million to \$4.3 million annually, including maintenance, software, and hardware support.⁴

Similarly AT&T has estimated that the costs of the Commission's record keeping requirements would be \$3-5 million.⁵

While Frontier does not have the same size and scope as AT&T or CenturyLink, Frontier believes that these estimates provide reasonable proxies of compliance costs if proportionately scaled to the size of each carrier, bearing in mind that the each carrier's revenues would be proportionately scaled as well. The initial set-up costs for compliance with the Commission's proposed rules would likely be consistent regardless of the carrier's scale.

The Commission has on the record numerous proposals that would allow the Commission to take meaningful steps to ensure rural call completion without the significant cost impact of its proposed rules. These include collecting and retaining a meaningful set of data instead of billions of data points⁶ and at a minimum limiting the data retention period to three months in all circumstances.⁷ While the Commission has a duty to ensure rural call completion, it also has a duty to impose any resultant requirements in the least burdensome way.⁸ Frontier encourages the Commission to fully consider the cost burdens associated with its proposed rural call completion rules.

Sincerely,

A handwritten signature in blue ink that reads "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.

⁴ Letter from John E. Benedict, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Dkt. No. 13-39, 1 (filed Oct. 23, 2013).

⁵ Letter from Brian Benison, AT&T, to Marlene H. Dortch, Secretary, FCC, WC Dkt. No. 13-39, 1 (filed Oct. 23, 2013).

⁶ See Comments of Verizon, WC Dkt. No. 13-39, 9 (filed May 13, 2013), Comments of Windstream, WC Dkt. No. 13-39, 2-3 (filed May 13, 2013), Frontier Comments at 9.

⁷ Frontier Comments at 9.

⁸ Another pragmatic example of limiting the burdens associated with the rules is to sunset data retention requirements at a date certain so data storage costs need not go on well past the end of the problem.