



Comcast Corporation  
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October 24, 2013

*Via Electronic Filing*

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

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

Dear Ms. Dortch:

On October 23, 2013, Robert Munoz and the undersigned of Comcast Corporation (“Comcast”) spoke by telephone with William Dever, Richard Hovey, Lisa Gelb and Carol Simpson from the Wireline Competition Bureau. The purpose of the call was to discuss Comcast’s position on the call completion performance metrics proposed in the above-captioned proceeding, as reflected in its filings in the docket.

Staff asked which performance metric Comcast believed was appropriate for originating providers to provide in connection with the Commission’s proposed call completion reporting requirements. Consistent with its prior written submissions in this proceeding, Comcast explained that the Commission should employ metrics that are designed to properly measure the ability of networks to deliver calls to the terminating location and exclude calls that are not relevant to an assessment of a carrier’s call completion performance. For that reason, Comcast asserted that the Network Effectiveness Ratio (“NER”) is a more accurate measure of network performance than the Answer Seizure Ratio (“ASR”) and generally explained the advantages of using the NER metric. While similar to ASR, the International Telecommunication Union notes that the “NER is designed to express the ability of networks to deliver calls to the far-end terminal” and “excludes the effects of customer behaviour and terminal behaviour.”<sup>1</sup> As a result, NER is a more useful call completion metric, since it measures the percentage of call failures that can be ascribed to *network* problems.

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<sup>1</sup> International Telecommunication Union, *ITU-T Recommendation E.425, Internal Automatic Observations*, at § 1.5 (2002), <http://www.itu.int/rec/T-REC-E.425-200203-I/en>; *see also* Comments of Comcast Corporation, WC Docket 13-39, at 9-10 (May 13, 2013) (citation omitted); Reply Comments of Comcast Corporation, WC Docket 13-39, at 7-8 (June 11, 2013) (citation omitted).

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: William Dever  
Lisa Gelb  
Richard Hovey  
Carol Simpson