



November 14, 2013

EX PARTE

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

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

Dear Ms. Dortch:

On November 14, 2013, the undersigned and Angie Kronenberg of COMPTTEL had a short telephone conversation with Carol Simpson and Lisa Gelb of the Wireline Competition Bureau regarding the Report and Order and Further Notice of Proposed Rulemaking released November 8, 2013 in the Rural Call Completion proceeding. We expressed concern that the Commission had changed the small carrier exemption from the data retention and reporting requirements from carriers with 100,000 subscribers (proposed rule 64.2107(a)) to carriers with 100,000 subscriber lines (adopted rule 64.2101(c)) without notice to the industry or an opportunity to comment on this significant difference. Similarly, we expressed concern that the Report and Order does not explain the reason for the change.

COMPTTEL also alerted Staff to the fact that two of the three examples given on page 12 of the Report and Order to explain how the definition of “initial long-distance call path choice” would work in practice appear to conflict.

If you have any questions or need additional information, kindly contact the undersigned.

Respectfully submitted,

/s/

Mary C. Albert

cc: Lisa Gelb
Carol Simpson