

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Rural Call Completion

WC Docket No. 13-39

**COMMENTS
of the**

**Idaho Telecom Alliance
Oregon Telecommunications Association
and
Washington Independent Telecommunications Association**

in response to the Further Notice of Proposed Rulemaking

January 16, 2014

INTRODUCTION

The Oregon Telecommunications Association (OTA) is a trade association that represents both incumbent local exchange companies and competitive local exchange companies operating in the State of Oregon who choose to join the association. All incumbent local exchange companies operating in Oregon are members of OTA. There are five competitive local exchange companies that have chosen to become members. A complete list of OTA's members is attached as Exhibit 1 with identification as to which of those members are participating in these Comments.

The Washington Independent Telecommunications Association a trade association that represents incumbent local exchange companies serving in the State of Washington. A list of its members is attached as Exhibit 2.

The Idaho Telecom Alliance is a trade association representing rural incumbent local exchange companies operating in the State of Idaho. A list of the members of the Idaho Telecom Alliance is provided as Exhibit 3.

For purposes of these comments, the Idaho Telecom Alliance, Washington Independent Telecommunications Association and OTA will be referred to collectively as the Northwest Associations.

In the Further Notice of Proposed Rulemaking (FNPRM), the Commission set forth several items for comment. The Northwest Associations will comment on the extension of

certification requirements to intermediate providers.¹ In addition, the Northwest Associations will comment on the proposed record keeping by rural incumbent local exchange carriers (ILECs) which the Commission identified in the FNPRM.²

The Northwest Associations support the extension of requirements to intermediate providers. It has been the experience of the members of the Northwest Associations that the problems with call completion are primarily associated with the use of intermediate providers.

The Northwest Associations do not support the proposed record keeping for rural ILECs. The primary reason for taking this position is that the largest portion of the problem of call completion exists with calls that never reach the terminating rural ILEC network. Therefore, keeping track of call attempts received and the number of answered calls which would result in a call answering rate calculation would make it appear as though there were very low levels of call completion problems when, in fact, that is not the case. In other words, the reporting would not provide meaningful information and may, instead, provide misleading statistics.

COMMENTS

First and foremost, the Northwest Associations extends their appreciation to the Commission for the work the Commission has done on the call completion issues. That work to date has resulted with the Call Completion Order. The Call Completion Order is an important step forward and the action of the Commission was very much needed. However, the problem has not disappeared. Further action is warranted.

¹ See, ¶122-123 of In the Matter of Rural Call Completion, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-135 (released November 8, 2013)("Call Completion Order").

² Call Completion Order at ¶ 128 and 129.

1. Call completion requirements should be extended to intermediate providers.

Rural ILEC members of the Northwest Associations have engaged in a great deal of time and effort over the past three years to try to understand and address call completion issues. Many customer complaints have been investigated. As a result of these efforts, it is the considered opinion of the rural ILEC members of the Northwest Associations that the biggest share of call completion issues are associated with intermediate providers.³

Based on the investigation of complaints, where there was information available to contact the originating caller, it appears that the call is properly delivered to the caller's interexchange carrier -- the first carrier in line. The problems arise once the interexchange carrier hands the call off to an intermediate provider, also called a call completion company or least cost router. As the Commission is aware, there are many times where there are a series of intermediate providers that become involved in the call stream. Often these call providers use a form of Internet Protocol transmission to send the call on its way and many times calls are handed off among two or more least cost routing companies for call termination. It is when there are multiple intermediate providers in the call stream that the problems of call completion appear to occur more frequently than when there is one or no intermediate provider.

Based on this experience, the Northwest Associations recommend that the certification compliance requirement discussed in the Call Completion Order should apply to intermediate providers.⁴ Any step to bring intermediate providers in to compliance and to be responsible for their actions is a good step forward.

³ In addition, as discussed below, the major problem is with calls that do not reach the terminating carrier's network.

⁴ Call Completion Order at ¶ 123.

2. The call answer rate calculation proposed in the FNPRM would not provide a true reflection of the call completion problem.

At paragraph 128 of the Call Completion Order, the Commission requests comment on whether the Commission should adopt a reporting methodology that each terminating rural ILEC report quarterly on the number of incoming long-distance call attempts received, the number answered on its network and the resultant call answer rate calculation. The Commission suggests that this step would produce an important benchmark against which to evaluate the number of call attempts that originating providers report as having reached a rural ILEC's terminating switch or tandem and the number the originating providers report as having been answered. Unfortunately, the call answer rate calculation as proposed by the Commission does not get at the heart of the call completion issue.

As noted above, rural ILEC members of the Northwest Associations have spent a great deal of time and effort investigating call completion complaints and issues. As a result of these investigations, it appears that the highest rate of incidents for call completion problems is with calls that never reach the terminating carrier's network. If calls do not reach the terminating carrier's network, then they would not be included in the call answer rate calculation. This means that just using call attempts received and the number of calls answered to come up with a ratio or percentage would improperly paint a picture of a much higher call completion percentage than is actually the case.

The Commission may not be aware that this matter is further complicated by the way in which traffic actually makes it to the terminating rural carrier. In many cases (although not all) a rural ILEC will have two common trunk groups into the rural ILEC's terminating switch. One will be through the toll tandem. The second will be through an Extended Area Service (EAS)

network, and calls are delivered to the terminating rural ILEC over this terminating EAS network. EAS calling is not regarded as long distance calling. EAS calling is treated as local calling, or, perhaps more technically correct, as "non-toll" calling.

The investigation of call completion problems has demonstrated that a number of calls that look to be EAS in nature are actually long distance calls that should have been routed through the access tandem, but were not. This routing of long distance calls through an EAS trunk can result innocently when a competitive local exchange carrier has a point-of-presence in an EAS area that exists between and RBOC and a rural ILEC and the ILEC chooses to route calls, even if they are toll calls, through its point-of-presence with the RBOC in an EAS network. This routing of long distance traffic over an EAS trunk can also occur not so innocently when intermediary providers replace ("spoof") the caller ID with a number that makes it look as though it were a local or EAS call. If a long distance call is disguised as other than a long distance call, it is very difficult to capture the call as a long distance call for reporting purposes.

Further, trying to capture the long distance call attempts received by a rural ILEC and the number answered on its network would only be useful if a comparison could be made to each originating carrier's call records. This cross-check would provide a comparison of what each originating provider is reporting specific to that originating provider's traffic relationship with what the rural ILEC is seeing as terminating on its network. That cross-check might produce an interesting comparison. However, given the use of common trunking through network tandems, the only way that carrier-specific tracking can be done is if the Carrier Identification Code (CIC) is transmitted in the call stream to the terminating carrier. Currently, the Commission's rules do not require that the CIC be transmitted to the terminating carrier. Therefore, many times the

records are incomplete and the terminating carrier cannot capture the information to be able to identify terminating traffic by originating carrier. This means the information gathered by the terminating rural ILEC may not be very meaningful if the data cannot be used to compare on a carrier by carrier basis with the originating provider's reports.

The Northwest Associations recommend that the Commission add a requirement of forwarding the CIC to the terminating carrier in the signal stream. If this step is taken, it may be possible to craft meaningful terminating call record reports.

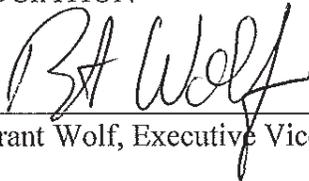
The rural ILEC members of the Northwest Associations support the efforts and progress of the Commission on call completion issues. The Northwest Associations' rural ILEC members are not afraid of rolling up their sleeves and get to work to try to help solve the problem. However, it does not appear that the call answer rate calculation would provide meaningful benefits given the fact that without the CIC, the data cannot be compared on a specific basis to each originating provider's reports. In addition, given the fact that the biggest single problem with call completion is with calls that do not even reach the terminating carrier's network, rather than the percent that are answered once received, the proposed call answering rate calculation would make it look as though the call completion problem is not as serious as it is. On that basis, the Northwest Associations cannot recommend to the Commission that it move forward with the requirement for call answer rate calculations.

CONCLUSION

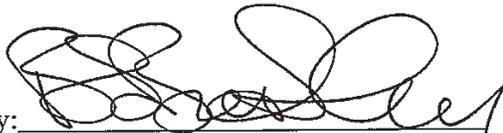
The Northwest Associations support the Commission's efforts on addressing the call completion problem. The Northwest Associations recommend that the Commission move

forward with its initiative addressing certifications by intermediate providers. The Northwest Associations do not support use of the call answer rate calculation because it does not address the major issues of call completion and would produce statistics that would make it look as though the call completion issue is far less serious than it actually is.

OREGON TELECOMMUNICATIONS
ASSOCIATION

By: 
Brant Wolf, Executive Vice President

WASHINGTON INDEPENDENT
TELECOMMUNICATIONS ASSOCIATION

By: 
Betty S. Buckley, Executive Director

IDAHO TELECOM ALLIANCE

By: /s/ Kate A. Creswell
Kate A. Creswell, Executive Director

EXHIBIT 1

Oregon Telecommunications Association
Member Companies

Asotin Telephone Company d/b/a TDS Telecom
Beaver Creek Cooperative Telephone Company
*CAL-ORE Communications
Canby Telephone Association d/b/a Canby Telecom
Cascade Utilities, Inc., d/b/a Reliance Connects
*CenturyTel of Oregon, Inc., d/b/a CenturyLink
*CenturyTel of Eastern Oregon, Inc., d/b/a CenturyLink
*Citizens Telecommunications Company of Oregon
Clear Creek Mutual Telephone Company
Colton Telephone Company, d/b/a ColtonTel
*Douglas Fast Net
Eagle Telephone System, Inc
*Eastern Oregon Telecom, LLC
*Frontier Communications Northwest, Inc
Gervais Telephone Company
Helix Telephone Company
Home Telephone Company d/b/a TDS Telecom
*McMinnville Access Company
*MINET
Molalla Telephone Company d/b/a Molalla Communications Company
Monitor Cooperative Telephone Company
Monroe Telephone Company
Mt. Angel Telephone Company
Nehalem Telecommunications, Inc., d/b/a RTI Nehalem Telecom
North-State Telephone Co
Oregon-Idaho Utilities, Inc
Oregon Telephone Corporation
People's Telephone Co
Pine Telephone System, Inc
Pioneer Telephone Cooperative
*Qwest Corporation
Roome Telecommunications, Inc
St. Paul Cooperative Telephone Association
Scio Mutual Telephone Association
Stayton Cooperative Telephone Company
Trans-Cascades Telephone Company, d/b/a Reliance Connects
*United Telephone Company of the Northwest
*Warm Springs Telecom

* Not participating in these Comments.

EXHIBIT 2

Washington Independent Telecommunications Association
Member Companies

Asotin Telephone Company d/b/a TDS Telecom
Ellensburg Telephone Company d/b/a FairPoint Communications
Hat Island Telephone Company
Hood Canal Telephone Co., Inc. d/b/a Hood Canal Communications
Inland Telephone Company
Kalama Telephone Company
Lewis River Telephone Company, Inc. d/b/a TDS Telecom
Mashell Telecom, Inc. d/b/a Rainier Connect
McDaniel Telephone Co. d/b/a TDS Telecom
Pend Oreille Telephone Company, d/b/a RTI
Pioneer Telephone Company
St. John Co-operative Telephone and Telegraph Company
Skyline Telecom, Inc.
Tenino Telephone Company
The Toledo Telephone Co., Inc. d/b/a ToledoTel
Western Wahkiakum County Telephone Company d/b/a Wahkiakum West Telephone
Whidbey Telephone Company d/b/a Whidbey Telecom
YCOM Networks, Inc. d/b/a FairPoint Communications

EXHIBIT 3

Idaho Telecom Alliance
Member Companies

ATC Communications
CTC Telecom
Custer Telephone Cooperative
Direct Communications
Farmers Mutual Telephone Company
Filer Mutual Telephone Company
Fremont Communications d/b/a FairPoint Communications, Inc.
Inland Telephone Company
MTE Communications
Oregon-Idaho Utilities
Project Mutual Telephone Cooperative Association, Inc.
Rural Telephone Company
Silver Star Communications