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February 14, 2014

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

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

Dear Ms. Dortch:

On February 12, 2014, Penn Pfautz, Christi Shewman and I of AT&T Services, Inc. met telephonically with Chris Killion and Margaret Dailey of the Enforcement Bureau and Bill Dever, Carol Simpson, Richard Hovey, Jean Ann Collins and Greg Kwan of the Wireline Competition Bureau.

In response to staff questions, we explained that AT&T's access verification records sample roughly one sixth of all traffic on the interexchange network on a daily basis from presubscribed LEC customers. We noted that this sample includes traffic to both rural and non-rural OCN's and would be sufficiently large to detect any difference in call completion rates to rural and urban OCNs. We emphasized that AT&T strives to provide consistently high quality call completion, meets the safe harbor in the order and complies with the ATIS best practices for call completion.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

cc: Chris Killion
Margaret Dailey
Bill Dever
Carol Simpson
Richard Hovey
Jean Ann Collins
Greg Kwan