Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Rural Call Completion	)	WC Docket No. 13-39

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") hereby respectfully submits its comments on the petitions for reconsideration and petition for waiver of certain aspects of the *Rural Call Completion Order*.[1] In addition to Sprint's own petition for reconsideration, petitions were filed by Transcom Enhanced Services; Comptel; Carolina West Wireless, Inc; jointly by US Telecom and ITTA; and Midcontinent Communications.

Sprint does not oppose any of the petitions filed. As these petitions make clear, the data collection, retention and reporting requirements adopted in this proceeding are burdensome, involve high compliance costs, or are otherwise unreasonable. US Telecom and ITTA, for example, asserted (p. 2) that their members will incur in excess of $100 million to comply with certain aspects of this order; Midcontinent Communications estimated (p. ii) that partial compliance with the new rules would cost "at least $150,000 in equipment cost and the addition of at least one additional full-time employee"; and Transcom, Comptel and Carolina West Wireless each proposed an interpretation/change to the covered carrier definition which would exempt them or certain of their members from the rural call completion data requirements. Sprint requested reconsideration of the portion of the Order relating to the Commission's intent to use filed call completion

[1] *Rural Call Completion, Report and Order and Further Notice of Proposed Rulemaking* released November 8, 2013 (FCC 13-135).

reports as the basis for subsequent enforcement action ("where necessary"), explaining that the lack of guidance as to what behaviors by covered carriers the Commission considered reasonable, or what performance results are actionable, render any enforcement actions stemming from the reports unreasonable and arbitrary.

Each of the petitioners has a strong incentive to provide the best possible service to all of their end user customers, whether the call terminates to a rural or a non-rural exchange, and there is no reason to suspect that the petitions represent an attempt to engage in untoward or unacceptable behavior. Rather, the petitions make clear that the rural call completion rules are excessively burdensome, and will have unintended consequences which do not serve the public interest. Sprint therefore urges the Commission to carefully consider the costs[2] versus the benefits of proceeding with implementation of these rules.

[2] It is to be expected that service providers will attempt to recover all of the costs they incur. Even if they decide not to increase the rates to their customers, but rather to absorb these regulatory costs themselves, such action will necessarily divert resources away from productive investments such as broadband deployment.

Respectfully submitted,

SPRINT CORPORATION

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