

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Notice of Public Information Collection(s))	
Being Reviewed by the Federal)	OMB Control No. 3060-1186
Communications Commission,)	
Comments Requested)	
)	

**DECLARATION OF NANCY LUBAMERSKY
IN SUPPORT OF
PAPERWORK REDUCTION ACT
COMMENTS OF U.S. TELEPACIFIC CORP.**

1. My name is Nancy Lubamersky. I am Vice President of Public Policy and Strategic Initiatives at U.S. TelePacific Corp. ("TelePacific"). My business address is 515 S. Flower Street, 47th Floor, Los Angeles, CA 90071-2201.
2. I am authorized to make this declaration on behalf of TelePacific.
3. I am providing this declaration in support of TelePacific's comments on the Commission's Paperwork Reduction Act analysis for its rural call completion reports. The purpose of my declaration is to explain the burden and cost associated with reporting the rural call completion data the FCC seeks to collect in quarterly reports.
4. At TelePacific, I am responsible for negotiating with carriers on issues regarding products and services, rates, terms and conditions, leading TelePacific's interdepartmental Revenue Opportunity and Cost Savings Steering Committee, and developing and implementing Public Policy advocacy at state PUCs, FCC and legislatures, and thus have a detailed understanding of how the regulatory framework applies to TelePacific's business.

5. TelePacific has a substantial network of its own, including switches, interoffice transport, and hundreds of collocations in ILEC wire centers in California, Nevada and Texas.
6. TelePacific delivers its customer's long distance calls directly to the terminating tandem in California and Nevada. TelePacific also delivers all long distance calls between TelePacific's customers directly on its own network, without using third party carriers. All other long distance calls originated by its customers are handed off to one of the three largest interexchange carriers ("IXCs") for termination.

Originating Call Records

7. TelePacific possesses originating call records for all long distance calls originated by its customers. Although TelePacific can use these records to determine the number of attempted calls and whether the calls were completed, the records are not sufficient to report all of the data requested by the FCC.
8. First, data based on originating records would not be 100% accurate by Operating Company Number ("OCN") because the called telephone number could be associated with the OCN of the former service provider where a number has been ported.
9. Second, reporting calls completed based on originating records also would overstate the percent of calls that fail to complete because some calls ring busy or are not answered by an answering machine when no one is there to receive the call.
10. Third, TelePacific would not be able to report three of the required categories. Within the TelePacific suite of switches there are six unique active switch types. Four of the switch types produce standard Extended Bellcore Automatic Message Accounting Format ("EBAF") records. EBAF records do not capture the Call Disposition information required to differentiate ring-no-answer, busy and non-working-number.

11. The alternative to using the originating switch recordings could be to capture the SS7 data which can differentiate ring-no-answer, busy, and non-working-number. For TelePacific, however, an originating call often transverses more than one of the TelePacific switches. Because a single call goes through two switches, there is an SS7 record capture for each switch involved in routing the call. In these cases where multiple SS7 records are captured, the call volumes would be overstated and would skew call completion data. Thus using SS7 data is not a viable alternative to differentiate ring-no-answer, busy, and non-working-number.

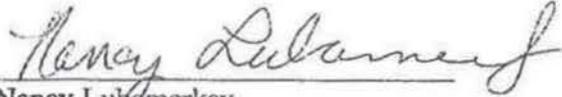
Terminating Call Records

12. If TelePacific had the ability to obtain terminating records for all of its customers' long distance calls, possession of such records would increase its ability to report some of the FCC-requested data, but not all of it.
13. If a long distance call is not terminated to another TelePacific customer, TelePacific does not possess terminating call records. Where TelePacific hands off long distance traffic directly to the terminating tandem provider, it may have an option, under contract or tariff, to obtain terminating call records. In a recent seven day traffic sample, TelePacific's customers attempted to make over 3.5 million long distance calls to telephone numbers assigned to over 185 OCNs in California alone. Where TelePacific hands off long distance traffic to a third party IXC for termination, TelePacific has no direct relationship with the terminating tandem provider. Its current IXC contracts do not provide an option for TelePacific to obtain terminating call records. Because it does not obtain terminating records from third parties on a regular basis today, TelePacific would have to seek all terminating call records solely for purposes of completing the FCC reports.

14. Assuming that TelePacific could negotiate with third parties to receive terminating recordings, it would increase the accuracy of TelePacific's reporting, but TelePacific still would not be able to report all of the requested information. Terminating call records are necessary in order to report one of the three of the categories of information sought by the FCC: ring-no-answer. However no terminating recording is produced for two of the three categories: (1) busy and (2) unassigned number which goes to a recording.
15. The terminating recording is also necessary to report calls completed by OCN. The N-1 switch (typically the terminating tandem) is responsible to perform the Local Number Portability ("LNP") dip to determine if the terminating telephone number is ported or pooled. If so, the Local Routing Number ("LRN") is returned to the N-1 switch where it is used to route the call to the correct switch. The LRN is captured when it exists in terminating call recording and is used in subsequent mediation applications to derive the OCN of the terminating service provider.
16. Even if TelePacific were to obtain all necessary terminating call records, TelePacific does not have a process in place to compare the originating and terminating call records, as a part of the mediation process which is necessary to determine the information required by the FCC's rural call completion reports.
17. Assuming that it could obtain terminating recordings from the tandem providers it interconnects with directly and from its wholesale IXCs that deliver its traffic to tandem providers with whom it has no relationship, TelePacific estimates that it would take months to create the first rural call completion report, and cost more than \$50,000 to develop an enhanced mediation process. This process would have to be developed for the sole purpose of filing rural call completion reports.

18. After a mediation process is developed, TelePacific estimates that it would take 50 hours to complete each quarterly report.

I declare under penalty of perjury that the foregoing is true and correct.



Nancy Lubamersky
Vice President, Public Policy and Strategic Initiatives
U.S. TelePacific Corp.

Executed on: February 28 2014
Los Angeles, California