

Jim Lamoureux
Senior Attorney
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052-6399

Tel 425 704 0836
Fax 425 936 7329
jimlamo@microsoft.com



March 27, 2014

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

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

Dear Ms. Dortch:

On March 24, 2014, I met with Gregory Kwan, Carol Simpson, and Richard Hovey, from the Wireline Competition Bureau, and Margaret Dailey from the Enforcement Bureau to discuss the Commission's rural call completion rules. In particular, we discussed the incongruity between the call retention rules (64.2103) and the reporting requirement rules (64.2105) as they apply to covered providers who make the initial long-distance call path choice for only a portion of their outbound PSTN traffic. In that case, there may be scenarios in which a covered provider is not subject to the call retention rules, because none of the traffic for which it makes the initial long-distance call path choice is bound for rural OCNs, but the covered provider may still be required under 64.2105(b)(2) to report the required data elements for such non-rural traffic in the aggregate. I explained the dilemma of potentially being subject to a reporting rule when the specific rule requiring the retention of the data that would be reported does not apply, and I pointed out the lack of any significant value of having a covered provider report only aggregate non-rural data as a result rules adopted in a proceeding focused on rural call completion.

If you have any questions, please contact me.

/s/ Jim Lamoureux

Cc: Gregory Kwan