BINGHAM

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VIA ECFS

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

Re: WC Docket No. 13-39 - In the Matter of Rural Call Completion
Notice of Ex Parte Communication

Dear Ms. Dortch:

On April 2, 2014, Nancy Lubamersky, Vice President Public Policy of U.S. TelePacific Corp. d/b/a TelePacific Communications ("TelePacific") (by phone) and the undersigned met with Carol Simpson, Richard Hovey, Gregory Kwan and Jamie Susskind of the Wireline Competition Bureau's Competitive Policy Division and Margaret Dailey of the Enforcement Bureau.

TelePacific explained the importance of completing all of its customers' telephone calls, whether to rural or urban areas, the steps TelePacific has taken to ensure that the calls are completed, and sample data that shows TelePacific's call completion rates in California and Nevada differ between rural and urban OCNs in the aggregate by less than one percent.

TelePacific reiterated its support for CompTel's Petition for Reconsideration of the 100,000 subscriber line de minimis threshold. TelePacific explained that it had not actively participated in the rulemaking because the Notice proposed a de minimis exemption of 100,000 subscribers, and TelePacific is well under that threshold. Had TelePacific known that it would be subject to the rural call completion reporting rules, the Company would have engaged earlier in the process to work with the FCC to develop a better means for providers to report call completion rates.

Ms. Lubamersky reviewed the limitations of originating and terminating switch records and the difficulties of using SS7 signaling data, which was not designed for recording call completion or information needed for billing purposes. In addition, SS7 information would overstate call volumes for calls that traverse multiple switches. The discussion was consistent with Ms. Lubamersky's Declaration filed in support of TelePacific's Paperwork Reduction Act Comments.[1] The participants discussed whether switch upgrades would enable providers to capture the release codes that indicate a busy signal or unassigned number. Ms. Lubamersky explained that switch upgrades typically cost tens of thousands of dollars per switch and that the business has no need for such information other than to comply with reporting obligations. Further, those reporting obligations may sunset in one year if the provider qualifies for the Managing Intermediate Provider Safe Harbor ("Safe Harbor"). The participants discussed whether a

[1] Ms. Lubamersky's declaration was attached to Reply Comments filed on March 11, 2014, and is available at http://apps.fcc.gov/ecfs/document/view?id=7521090603.

Safe Harbor provider could use sample data showing rural call completion rates to avoid expensive switch upgrades and personnel resources necessary to provide reports for only one year.

Sincerely,

/s/ *electronically signed*

Tamar E. Finn

Counsel for U.S. TelePacific Corp. d/b/a TelePacific Communications

cc: Carol Simpson
Margaret Dailey
Richard Hovey
Gregory Kwan
Jamie Susskind