

providers to report different types of calls, including “calls attempted,” “answered,” “busy,” “ring no answer,” and “unassigned number.”⁴ The Commission on the template indicated that “answered” calls would have ISUP cause values of 16 and 31 and corresponding SIP response messages of BYE and CANCEL.⁵ However, as noted by Level 3, ISUP cause 16 can be reported when a calling party hears ringing but hangs up before the called party answers.⁶ This would not be an “answered” call under the definition adopted in the *Rural Call Completion Order*.

To ensure that calls are categorized in accordance with the Commission’s definition of answered calls, the Bureau should clarify that calls should be reported as “answered” only if they meet the following conditions: (i) they are signaled back with ISUP 16 and 31 and SIP BYE and CANCEL codes; and (ii) they are identified as answered in call detail records reported by the switch. Where the call detail record indicates that calls with these codes are unanswered, they should be reported as “ring no answer” calls.⁷ Making this clarification will provide clearer guidance on the proper reporting of calls based on ISUP and SIP codes, and will avoid the data mismatch that would occur if all guidance on the template were eliminated and providers were left to rely on their own interpretations of the Commission’s call category definitions.

The Bureau should also clarify on the template that providers should exclude from the report calls that are handed back. The Commission found that, “To obtain a fair measure of total call attempts, we find it appropriate to exclude call attempts handed back to the upstream provider from the recording and retention requirements if the upstream provider makes further

⁴ *Id.*

⁵ *Id.*; *Public Notice*, DA 14-526 at 2.

⁶ Letter from Joseph C. Cavender, Vice President Federal Affairs, Level 3, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 13-39, at 1 (Jan. 29, 2014).

⁷ IP Multimedia Subsystem (IMS) platforms may also have vendor specific response codes indicating “ring no answer”.

attempts to complete the call, whether on its own network or through a different intermediate provider.”⁸ Some of these calls may be reported with SIP codes listed on the template, e.g., SIP codes 404 and 480. To the extent calls with these codes are treated by the originating provider as calls handed back, the Bureau should indicate on the template that they should not be included in the report.

Respectfully submitted,

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⁸ *Rural Call Completion Order*, 28 FCC Rcd at 16181, ¶58.