

II. DISCUSSION

A. “Answered” Call Attempts

In the *Public Notice*, the FCC seeks comment on the criteria described in Appendix C of the recently-released *Report and Order* establishing call completion recording, retention and reporting rules.² This appendix provides a spreadsheet that covered providers must use to file the required call completion data with the FCC and includes a legend that identifies ISUP Cause Codes and corresponding SIP Response Messages for each category of call attempt.

CenturyLink agrees with comments that question the methodology of using ISUP cause codes for determining what constitutes an answered call. Examples of problems with the methodology are as follows:

ISUP Cause Code 16: ISUP Cause Code 16 is one of the codes identified in Appendix C as denoting an “answered” call. Cause Code 16 may be returned by the local provider when the calling party hangs up before the called party answers and therefore may be more accurately categorized as a “ring no answer call.” This code also may be returned to indicate the release an answered call in place of ISUP Cause Code 31(normal release). Therefore, CenturyLink agrees that Cause Code 16 does not conclusively identify the universe of “answered calls.”

BYE SIP Response Message: The use of the SIP Response Message “BYE” may not always indicate that a call has been “answered” as indicated in Appendix C. While SIP BYE is normally sent on normal release of an answered call, it can also be sent after alerting but before answer. Therefore, CenturyLink believes that the use of this code to denote answered calls may also result in the over reporting of answered calls.

Thus, CenturyLink agrees with comments suggesting that calls should be categorized according to the definitions as specified in the *Report and Order* rather than through the methodology set forth in Appendix C.

CenturyLink believes that the best means to categorize a call as an “answered call” is to base the determination not merely on signaling indicators, but to investigate into the calls via the

² *Id.*

Call Detail Record (CDR) for the indicator of conversation time.³ CenturyLink sees this as the most appropriate means to show an “answered call” because it aligns with how billing to customers is determined. Using this indicator will avoid the concerns regarding the overstatement of answered calls using the SS7 cause code indicators alone. CenturyLink intends to use the indicators of conversation time in our determination of an “answered call.”

B. “Ring No Answer” Call Attempts

As the *Notice* suggests, problems also exist with respect to SIP Status Codes 408 and 480, which are associated in Appendix C with “Ring No Answer.” Due to this inconsistency, the meaning of SIP Status Code 408 and 480 is not clear and may not accurately represent Ring No Answer calls.

CenturyLink intends to determine “busy” call attempts via appropriate cause code indicators, appropriate disconnect reason codes, and the absence of conversation time. Similarly, for “ring no answer” call attempts, CenturyLink intends to determine “ring no answer” via appropriate cause code indicators, appropriate disconnect reason codes, and the absence of conversation time.

C. Collaborative Process May Be Useful In Addressing Call Completion Data Issues

In the *Public Notice*, the FCC also asks how it should address the issues associated with the codes and messages cited in Appendix C (i.e., should additional guidance be provided or should the legend in Appendix C be deleted, allowing each covered provider to interpret the required call attempt categories in a manner consistent with industry practice and with the Commission’s stated intent in the *Report and Order*). While it is anticipated that other service providers will provide their own views on how to address the identified issues associated with

³ In a Sonus switch, the indicator is “Call Service Duration” and in the Genband/DMS, it is the “CallDur” (Call Duration) field.

the codes and messages in Appendix C, CenturyLink continues to believe that a collaborative process among industry stakeholders is an appropriate way to address issues associated with the call completion data collection and reporting.

III. CONCLUSION

CenturyLink appreciates the opportunity to provide its input in response to the April 21, 2014, *Public Notice*.

Respectfully submitted,

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