



June 16, 2014

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Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Communications, WC Docket Nos. 13-39

Dear Ms. Dortch:

On June 13, 2014, Mark Montano, Kitty O'Hara, Tim Vogel, Carlos Mezarina, and I, all of Verizon, met with Randy Clarke, Jean Ann Collins, Richard Hovey, Greg Kwan, and Carol Simpson of the Wireline Competition Bureau to discuss the Commission's retention and reporting requirements in the above captioned proceeding.

Verizon explained that whether a call is actually picked up by the called party says nothing about whether an originating or intermediate carrier properly delivered the call. This is demonstrated by Verizon's recent investigations of rural OCNs with low call answer rates. Because these investigations uncovered *no* evidence of network or routing issues, Verizon suggested that the Commission focus on call delivery and obtain data that can be used to calculate the Network Effectiveness Ratio (NER) as specified by the Order. As such, the Commission should stay the course and collect the data as set forth in Appendix C.

Verizon further explained that its efforts to implement the Order have been based on Appendix C. Verizon indicated that changes to how calls are categorized in Appendix C would require an additional implementation period.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy".

cc: Randy Clarke
Jean Ann Collins
Richard Hovey
Greg Kwan
Carol Simpson