

ATIS' Rural Call Completion comments cited.

Big Carriers Support Industry Answer to Rural Call Completion

The FCC should let industry self-regulate rural call completion and eliminate recording, reporting and retention rules, large carriers commented this week in docket [13-39](#). But smaller rural carriers said required reporting improved call-completion rates. A July [Further NPRM](#) (see [1707270053](#) and [1707130054](#)) seeks to change or eliminate data-collection and reporting rules and require covered carriers to monitor rural performance of their intermediate providers and hold those providers accountable.

Costs of reporting exceed benefits, agreed industry groups and big companies. It's "a paperwork burden for the covered carrier particularly when it has been shown that they no longer serve their intended purpose," USTelecom [commented](#). The Voice on the Net Coalition [said](#) it's "expensive and time-consuming to collect the data and prepare the reports," saying one member estimates \$32,000 and 32-40 hours annually. CTIA [agreed](#) reporting is "unnecessary and burdensome." AT&T, Verizon and Comcast separately supported killing the reporting rules and holding providers accountable, preferring an industry answer.

Reporting rules are why rural call completion improved, countered NTCA and WTA [jointly](#). They should be kept unless an effective replacement is found, the groups of small RLECs said. "Years of clarifications, warnings and admonishments reminding originating providers of their obligations to monitor their networks and ensure that rural calls complete were ineffective," NTCA and WTA said. "Astonishingly, now that the situation has improved, the Commission proposes to retract its existing recording retention and reporting rules and rely on covered providers."

Larger carriers said their work as an industry makes a difference and urged the FCC to facilitate more collaboration. "It seems as though companies of all sizes agree that they are seeing some actual improvement in the call completion problems and want to find a way to continue to monitor and solve ad hoc problems as they come up," USTelecom said. The FCC could spur industry collaboration by publishing a list of contacts at each provider company and requiring all providers to make available test lines that originating providers can use to check reliability of call routes and identify and resolve termination problems, NCTA [said](#).

Industry best practices by the Alliance for Telecommunications Industry Solutions are working but shouldn't be mandated, **commented** the standards body. While the best practices are widely used, "they are not universally applicable and there are legitimate situations in which a Best Practice may not be implemented by a service provider," including "the protection of networks and/or concern for customers' need," ATIS said. Certain providers are causing problems, not the whole industry, said CTIA. "Rather than adopting an overly broad industry-wide rule, the Commission can continue to utilize Sections 201 and 202 of the Communications Act to evaluate carriers' call completion practices."

Intermediate provider HD Tandem supported mandates, including a ban on more than two intermediate providers in rural call completion paths, with a waiver mechanism for carriers that must use more. "The effectiveness of a limit would go beyond the obvious advantage of reducing the opportunities for call failure: to comply with a two-carrier limit, originating carriers would have to know the identity of the one or two intermediate carriers in the call path, and prohibit them from introducing additional intermediate carriers into the call path," HD Tandem **commented**: The FCC should require carriers buy additional trunking capacity when average utilization of any trunk group used to complete rural calls exceeds 80 percent.

"Use of multiple providers in the call paths contributes substantially to the call completion failures," the National Association of State Utility Consumer Advocates **said**. But it warned about consequences of removing a safe harbor provision that relaxes reporting and retention duties if a covered provider minimizes the number of intermediate carriers in call routing.

The FCC should allow carriers to offer a special service exempt from call-completion rules, **said** CenturyLink, a safe harbor provider. "Customers should have the choice to agree to a reduced cost per call in exchange for the risk that multiple intermediate carriers may be involved in a call path and a call might be marginally less likely to reach its intended destination."

Completing an intercarrier compensation revamp may resolve rural call completion problems, AT&T **said**. Similarly, Sprint **commented** that one key way to address problems is speeding implementation of bill and keep.

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