











As noted above, Commission precedent dictates that no carrier may “block, choke, reduce or restrict traffic in any way.”<sup>10</sup> The Commission has expressed concern that such practices “may degrade the reliability of the nation’s telecommunications network.”<sup>11</sup> As the Commission has recognized, “it is not difficult to foresee instances in which the failure of a call to go through would represent a serious problem and, in certain instances, it could be life-threatening.”<sup>12</sup> When a carrier knows, or should know, that calls from its network are not completing or that ringing on the called party’s end is delayed to the point where the calling party gives up and hangs up, its failure to correct the problem or use a good faith effort to work with the called party’s carrier, is effectively blocking calls from getting through.

Moreover, the transmission of garbled or inaccurate caller ID information violates **Part 64 of the Commission’s rules**. Common carriers using SS7 are required to transmit the calling party’s number associated with an interstate call to interconnecting carriers.<sup>13</sup> Yet again, the fact that an Underlying Provider may be involved does not excuse the Retail Provider from complying with these obligations – and a Retail Provider should not be permitted to sidestep compliance with such obligations by using an Underlying Provider that it knows or has reason to know does not comply with such requirements. To the contrary, the originating carrier has an obligation to ensure that the proper caller ID information is transmitted through the transmission path to the called party’s carrier.

Of course, the Underlying Provider itself may (and likely should in most cases) be subject to these same legal and regulatory obligations described above as an independent matter. But it has been difficult for RLECs to even get Retail Providers to work with them on troubleshooting call routing and termination problems in many cases, never mind asking help of the Retail Provider in “piercing the veil” to identify any given Underlying Provider in a given call flow. Thus, the Rural Representatives suggest (and formally request) that the Commission initiate a thorough investigation of the interexchange call routing practices of the Retail Providers identified in the accompanying materials. The Rural Representatives also request that the Commission include the Retail Provider who, as indicated in Appendix B hereto, has specifically indicated it will not complete calls to certain rural or other supposedly “cost prohibitive” areas.

In anticipation of this investigation, the Rural Representatives suggest that the Commission ask of each such Retail Provider the questions attached as Appendix C (among any other that it may deem appropriate) to determine both the Retail Provider’s culpability in any call routing and termination problems *and* the identify of any and all Underlying Providers who may be involved in failing to complete calls to rural areas.

We appreciate the Commission’s interest in resolving these significant concerns. These practices are threatening commerce, public safety, and the ability of consumers in rural America to access and use a reliable network. The value of the Nation’s telecommunications network is compromised, and the

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<sup>10</sup> *Call Blocking Order*, 22 FCC Rcd at 11631, ¶ 6.

<sup>11</sup> *Id.* at 11631, ¶ 5.

<sup>12</sup> *Access Charge Reform, Reform of Access Charges Imposed by Competitive Local Exchange Carriers*, CC Docket No. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking, 16 FCC Rcd 9923, 9934 (2001), at ¶ 24.

<sup>13</sup> 47 C.F.R. § 64.1601(a).



Redacted for public inspection.



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## Carrier Specific Call Termination Issues Survey Summary

Originating Carrier/Provider Name	Grand Total	Unknown	Carrier A	Carrier B	Carrier C	Carrier D	Carrier E	Carrier F	Carrier G	Carrier H	All Others
<b>Total Complaints</b>	<b>10,163</b>	<b>3,578</b>	<b>1,347</b>	<b>1,127</b>	<b>668</b>	<b>650</b>	<b>542</b>	<b>361</b>	<b>335</b>	<b>327</b>	<b>1,228</b>
		35%	13%	11%	7%	6%	5%	4%	3%	3%	12%
<b>Complaint percentages by type:</b>											
Calls failing to complete	<b>53%</b>	50%	65%	44%	43%	11%	67%	65%	44%	63%	62%
Extremely poor voice quality	<b>16%</b>	26%	8%	7%	17%	4%	5%	7%	7%	19%	16%
Delayed ringing at receiving end	<b>13%</b>	9%	8%	8%	13%	78%	6%	17%	13%	16%	8%
Inaccurate or unintelligible caller ID	<b>11%</b>	11%	12%	28%	16%	7%	14%	6%	2%	1%	7%
Inaccurate or misleading interception messages	<b>5%</b>	2%	3%	10%	10%	1%	6%	5%	25%	1%	6%
Other	<b>2%</b>	1%	4%	3%	0%	0%	2%	1%	10%	0%	2%
<b>Carrier response to resolution efforts</b>											
Opened a trouble ticket and cooperated with ILEC staff	<b>56%</b>	N/A	13%	67%	100%	65%	15%	27%	47%	11%	67%
Would not open a trouble ticket/only blamed others	<b>22%</b>	N/A	79%	5%	0%	0%	45%	27%	31%	0%	14%
Other	<b>11%</b>	N/A	6%	22%	0%	25%	27%	37%	12%	1%	8%
Opened a trouble ticket but only worked with calling party	<b>11%</b>	N/A	2%	6%	0%	10%	13%	8%	10%	88%	12%
<b>Resolution status:</b>											
Temporarily resolved (issues recurred after some time)	<b>44%</b>	24%	40%	28%	98%	50%	23%	37%	52%	93%	39%
Unresolved	<b>32%</b>	66%	6%	20%	0%	19%	30%	25%	47%	3%	16%
Permanently resolved	<b>24%</b>	10%	54%	52%	2%	32%	48%	38%	1%	5%	45%

## Carrier Specific Call Termination Issues Survey

### Steps RLECs have taken to attempt to resolve the issue with originating carriers/providers

#### Comment 1

*“Please understand that this has been a very difficult issue to retrace because for a long time we thought that the issue was ours. This is one reason that we do not have as much documentation as we would like to provide. We can assure you that we have received hundreds, if not thousands, of complaints over the past two years. We have spent countless hours outside of normal work hours and on weekends chasing resolutions to problems that were beyond our ability to fix.*

*“The scenarios have varied over the past two years. Many times the originating carrier told their customer that the issue was on our end. We tried various avenues to resolve their problems without success. Many complaints appeared to be the same customers not receiving calls from the same family or friends—so we thought. In the past six to twelve months, many other members have reported that they were having this problem for a long time but were not calling our office.*

*“We tried checking everything on our end, but never found any issues that we could pinpoint to a malfunction or mishap in our network. Many customers were upset with us, especially our business customers, because they believed and were told from the party calling them that the issue was in our network. However, this has never been the case to this point in time.*

*“In the beginning, many customers complained but would not provide information about the originating party because they were sure the issue was in our network. On other occasions, the originating party was not eager to help or open a trouble ticket on their end because they too thought the issue was in our network. The originating party was not always happy to spend their time helping us resolve what they perceived as our issue. As a result, we do not know in many cases what the outcome was, or even if the customer did indeed open a trouble ticket with their carrier.*

*“As we gained experience in dealing with this dilemma, we became adamant that the originating party must open a trouble ticket with their LD provider. This came about because [redacted] eventually got to a point where they did not want to help try and resolve issues for LD companies that were not checking their own networks first. For a while, [redacted] would open a trap to see if calls were making it to their network, but this could only happen if the originating party was willing to place a test call at a specific time when the trap was open.*

*“We finally concluded that the originators of LD calls must open trouble tickets with their provider. It only made sense because if our LD customers had a problem completing a call, they did not call the terminating end and tell them they had a problem, nor did we. Instead, they called us and we opened a trouble ticket with our wholesaler. This is the only means that we have found of making any progress with these terminating call issues.”*

Redacted for public inspection.

#### Comment 2

*"All call problems are reported to [redacted] who is our CEA tandem. Call problems range from unusable quality to non completed calls. Problems are resolved temporarily from several hours to several days. Very difficult to determine the number of failed calls. All [known] failures are reported to [redacted]. These numbers are only the tip of the iceberg as most of our customers are not aware when calls are not reaching them as these calls never get to our network."*

#### Comment 3

*"Opened excessive numbers of trouble tickets, both with wireless carriers (mainly [redacted]), ILEC owners of the tandems ([redacted] and [redacted]) to no resolution. We found no problems between us and the ILEC's but also were never able to identify the problem. Tickets with wireless carriers were closed with virtually no troubleshooting on their part, with no resolution or explanation, 100% of the time. We suspect there is a wholesale VOIP provider somewhere in the call progression that is causing these issues, but [we] have been unable to identify them. We can consistently recreate the call problems making test calls on our [redacted] cell phones."*

#### Comment 4

*"With [redacted] I worked for more than 90 days to resolve this issue, they would not take any responsibility the first 60 days until I could provide all the test proof to them that it had nothing to do with us. Even then they couldn't resolve the issues, when customers would call them they would say it was the customer's local provider and then the customer wouldn't believe us as [redacted] couldn't possibly lie about something like this. We lost customers over this issue."*

#### Comment 5

*"This is a very difficult problem to address because it is normally reported by one of our customers that is not receiving calls. We leave messages with the originating caller, but often they don't return our calls. When we are able to make contact with the originating party, they are not always cooperative, they just see it as our problem, and we should be able to fix it without wasting their time. In almost every case, in the initial report, the carrier blames [redacted] for the problem, until we challenge them. In all cases the carrier does tell us they reroute the calls, and they work, but within 2 weeks they stop working."*

#### Comment 6

*"In all cases, OUR own customers called us thinking it was a problem with our lines as they were not receiving calls. We determined the people calling them were [redacted] customers. We informed them to tell the originating caller to contact [redacted], but we do not know if this was done. One [customer] had trouble contacting our own line at the office - quality of voice was poor and she hung up. Tried to call me back for 2 hours and said it kept ringing on her end, but never rang here. Her caller ID number was also incorrect."*

#### Comment 7

*“For the most part, we have advised that the caller needs to open a ticket with their carrier. In some cases we were able to work with [redacted] directly as we had employees who were [redacted] customers and then able to work from that angle. In this case, we would see the fix, but it was temporary.”*

#### Comment 8

*“With the inbound call issues we have seen, most of the troubles have been reported by our subscribers as not being able to receive some of their phone calls. In some of these cases we do not get any SS7 messages indicating an incoming call ever reached our switch. We have to contact our customer and get the phone number of the originator and call them to request that they submit a trouble with their long distance provider. Most of the time their long distance provider would tell their customer the trouble was with the terminating switch, and was not their problem. In the cases where we do see an incoming call to our switch we immediately turn in a trouble with the terminating LD carrier. All LD carriers have been for the most part unresponsive to our trouble tickets, except for [redacted]. If we were lucky enough to get an issue taken care of the LD companies would not provide us with name of the carrier responsible and no indication of cause.”*

#### Comment 9

*“Each time, the trouble is tested on our end to make sure everything is working properly, then if no trouble is found, the customer is instructed to have the originating caller contact their LD provider or wireless provider to report the trouble on their end. We usually do not hear the results of those trouble reports.”*

#### Comment 10

*“Have traced a few calls with [redacted]/ [redacted] and determined they were being dropped somewhere in route. These are only the reports that were recorded. There were many, many more instances.”*

#### Comment 11

*“We just recently started tracking these issues but in all cases we do not see these calls hitting our switch. The testing that has taken place resulted in calls completing during testing but after a short period of time the end user is not able to complete the calls again.”*

#### Comment 12

*“We attempted to call [redacted] ourselves to help our customers who were having problems. [Redacted] refused to open trouble tickets for us. [Redacted] insisted that the originating caller had to call their long distance carrier. However, the originating caller, unless they had some other way to communicate to the customer in our area, would not have known there was a problem, since most of the calls we surveyed were rings on the originating end that never connected to our terminating customers.”*











