



August 18, 2014

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re:

In the Matter of Rural Call Completion, WC Docket No. 13-39

Dear Ms. Dortch:

NTCA–The Rural Broadband Association (“NTCA”), WTA – Advocates for Rural Broadband (“WTA”) and the National Exchange Carrier Association (“NECA”) (collectively, the “Rural Representatives”) write to express concern about the continuing delay in implementation of the rural call completion order. Although rules to address rural call completion problems were adopted in October 2013, a full ten months later not only are the record keeping and reporting rules not in effect, but it is our understanding that the Federal Communications Commission (the “Commission”) has yet to complete the submissions to the Office of Management and Budget necessary for approval and implementation – meaning that the rules are likely still many months away from even starting to take effect.

Rural call incompleteness is a problem of which the Commission has been aware of for many years. The Rural Representatives first brought the issue to the attention of Commission staff in a series of letters and meetings in early 2011. There is an ample record that includes data and anecdotal information describing the extent of the problem and the serious public safety and financial ramifications of call failure. Rural communities, businesses and individuals’ well-being and safety are being compromised on a daily basis. Family members have been unable to contact loved ones, rural businesses have lost opportunities and customers, doctors have been unable to reach patients, hospitals have been unable to reach on-call emergency surgeons and there is a reported instance in which a 911 call center was unable to make emergency call backs.

While the Commission has taken intermediate steps to address rural call incompleteness, more than three years after the Commission was made aware of the issue, calls to rural consumers continue to fail. Yet, beyond a handful of individual consent decrees, neither the Commission nor the public has any better visibility into the precise sources of such problems and a clear sense of how to address

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them today than three years ago. Given the Commission's professed commitment to identifying and remedying the causes of call incompleteness, it is far past time for the Commission to put into place the tools necessary to do so.

The Rural Representatives therefore urge the Commission to promptly submit the rural call completion record keeping and reporting requirements for the necessary approvals. The greater transparency provided by the pending rules will ensure that the industry more seriously addresses this issue and will provide the Commission with the necessary tools to take appropriate further action, whether that may be additional rules or enforcement of existing requirements. The Rural Representatives also urge the Commission to act on its Further Notice of Proposed Rulemaking, specifically addressing concerns regarding intermediate providers. Without visibility into the intermediate provider marketplace, any problems arising within such networks may continue to prove difficult, if not impossible, for the Commission to identify and remedy.

The Commission must act immediately to ensure that calls complete. It has taken some important steps toward that goal, but it simply needs to finish the job by: (1) ensuring its reporting and record-keeping rules finally take effect; (2) using the data obtained via those reports to help identify and remedy the causes of rural call incompleteness; and (3) ensuring greater transparency in the opaque intermediate provider marketplace.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Jill Canfield

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