

Contacts:

Joe Douglas, NECA
202-682-0153, idouglas@neca.org
Caitlin Colligan, NTCA
703-351-2086, ccolligan@ntca.org
Martha Silver, OPASTCO
202-659-0828, mks@opastco.org
Derrick Owens, WTA
202-548-0202, derrick@w-t-a.org
Carole Woodward, ERTA
919-708-7404, woodward@nctia.org

RURAL TELECOM ASSOCIATIONS SUPPORT FCC PROPOSED TRUTH IN CALLER ID RULES

ASSOCIATIONS SEE IMPORTANT RELATIONSHIP BETWEEN CALLER ID RULES AND RULES ON CALL SIGNALING INFORMATION

Caller ID and "Phantom Traffic" Problems Solution Available If Commission Requires All Voice Providers, Regardless of Technology, to Send Correct CPN in Call Signaling Information

WASHINGTON (April 18, 2011) – Today, the National Exchange Carrier Association (NECA), the National Telecommunications Cooperative Association (NTCA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), the Western Telecommunications Alliance (WTA), and the Eastern Rural Telecom Association (ERTA) filed comments supporting the Commission's proposed Truth in Caller ID rules, pointing out that both the Truth in Caller ID problem and the "Phantom Traffic" problem could be resolved if the Commission is consistent in its rules and applies those rules to all voice service providers.

The associations urge the Commission to:

 Require carriers and other voice service providers to send correct Calling Party Number (CPN) information. The Associations encourage the Commission to be consistent in its rules and apply these rules as broadly as possible to all voice service providers.

Truth in Caller ID Joint Association Comments/2-2-2

- Include additional signaling requirements in the Caller ID rules and call signaling rules, including information transmitted in the SS7 Jurisdiction Information Parameter (JIP), and specifically requiring that providers of commercial mobile radio service (CMRS) and VoIP services populate the JIP in signaling data.
- Adopt both sets of rules, as they apply to Truth in Caller ID and to phantom traffic, in the same timeframe.

Additionally, the associations urge the Commission to take immediate action to address the issues, which are related to an epidemic of call termination problems on the public switch telephone network. These problems include (1) calls that ring for the calling party, but not at all or on a delayed basis for the called customer of the RLEC; (2) calling parties who receive incorrect or misleading message interceptions before the call ever reaches the RLEC or the tandem it subtends; (3) calls that appear to "loop" between routing providers, but never reach the RLEC or the tandem it subtends; and (4) directly related to this NPRM, incorrect caller ID that displays to called parties. The Associations have a substantial interest in the Commission taking steps as soon as possible to address caller ID gamesmanship and other problems that are having significant negative effects on the ability for consumers to make and receive reliable long distance calls.

"This is part of the bigger picture issue of call termination problems, which we've brought to the FCC's attention in the past several years. By tightening up Caller ID rules, the Commission can put a stop to unscrupulous Caller ID practices such as spoofing, or as I like to call it, 'fraud,'" said Bill Hegmann, NECA President and CEO.

"Communications networks can't realize their full potential if certain entities can game the system by disguising themselves or the traffic they send," said NTCA Chief Executive Officer Shirley Bloomfield. "It is essential as a matter of public policy, public safety and the public interest that consistent rules are in place to ensure that service providers can identify one another and that communications flow seamlessly to and from rural America."

"The Associations are handing the Commission the solution to two important issues, truth in Caller ID and phantom traffic. Requiring CPN and JIP information for all voice providers will have a huge consumer benefit and provide carriers with the ability to rightfully bill the correct parties," OPASTCO President John Rose stated.

"All voice service providers, regardless of technology used, should ensure that calls going over their networks have the correct identifying information," said Kelly Worthington, WTA's Executive Vice-President. "Consumers and carriers alike will benefit from the reforms the Associations advocate."

"This is a chance for the FCC to put in place a win-win for consumers and for companies. Both consumers and companies would benefit from Caller ID rule changes that help reduce confusion and fraud," stated ERTA Executive Director Carole Woodward.

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The **National Exchange Carrier Association** (NECA) is a membership association of U.S. local telephone companies, dedicated to keeping customers connected on state-of-the-art communications networks. Our services help more than 1,000 members across rural America deliver high-speed multi-use broadband systems. Visit us at www.neca.org.

The **National Telecommunications Cooperative Association** is the premier association representing more than 570 locally owned and controlled telecommunications cooperatives and commercial companies throughout rural and small-town America. NTCA provides its members with legislative, regulatory and industry representation; meetings; publications; and educational programs; and an array of employee benefit programs. Visit us at www.ntca.org.

The Organization for the Promotion and Advancement of Small Telecommunications
Companies (OPASTCO) is the leading voice for rural telecommunications, representing
approximately 470 small incumbent local exchange carriers serving rural areas of the United
States. Its members include both commercial companies and cooperatives, which collectively
serve more than 3 million customers. OPASTCO represents rural telecommunications interests
before federal regulatory bodies and Congress, provides publications, and holds two
conventions annually in January and July of each year, addressing the needs of the small
telecommunications industry. The association has an affiliate 501(c)(3) nonprofit the foundation
for Rural Education and Development (FRED). Visit us at www.opastco.org.

Western Telecommunications Alliance (WTA) is a trade association whose membership is comprised of approximately 250 rural telecommunications carriers providing high-quality, voice, video and data services throughout rural areas in the 24 states west of the Mississippi River. On average, WTA member companies serve fewer than 3,000 access lines with fewer than 500 customers in each exchange. WTA's members serve some of the most rural and hard-to-serve communities in the country and are on the forefront of bringing 21st Century telecommunications services to rural America. www.w-t-a.org

ERTA (ERTA) is a trade association comprised of local exchange companies and support companies providing telecommunications services to rural customers in the Eastern half of America. ERTA companies are providers of local, long distance, wireless, cable television, and broadband Internet service.