



January 26, 2012

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

Ex Parte Notice

Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Rules and Regulations Implementing the Truth in Caller ID Act of 2009, WC Docket No. 11-39

Dear Ms. Dortch:

On Wednesday, January 25, 2012, the undersigned on behalf of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Jill Canfield of the National Telecommunications Cooperative Association (NTCA), Eric Keber of the Western Telecommunications Alliance (WTA), and Colin Sandy, Robert Gnapp and Mark Novy of the National Exchange Carrier Association (NECA) (the "Rural Representatives") met with Terry Cavanaugh, Margaret Dailey and Chris Killion from the Enforcement Bureau, and Richard Hovey and Rebekah Goodheart of the Wireline Competition Bureau to discuss continuing concerns with respect to call routing and termination failures. Robert Gnapp and Mark Novy attended the meeting by telephone.

The Rural Representatives reiterated the ongoing problem of calls not properly completing to consumers in rural areas and expressed frustration with the industry's lack of appropriate and timely response. The Rural Representatives emphasized that while the trade groups listed above continue to constructively engage with originating carriers, interexchange carriers, and other industry groups to find lasting solutions to this problem, Commission action is required. The Rural Representatives further noted that industry data collected by NECA has been shared and filed publically, and individual company data has also been provided to carriers upon request.

The Rural Representatives again emphasized that repeated efforts that focus on the reaction of rural carriers when they are informed of call completion problems by consumers are redundant. In order to determine and remedy the causes of this problem, it is past time to closely examine the practices and data of originating and interexchange carriers, as well as other entities such as least-cost route providers, that may lie between an originating caller and the terminating network. It is these parties, not terminating

carriers whose networks often never receive the calls in question, which have the relevant information that can best explain, and lead to a resolution of, this ongoing crisis.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please contact me at (202) 659-0715 or sfp@opastco.org.

Sincerely,

/s/ Stephen Pastorkovich

Stephen Pastorkovich

Business Development Director/
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