



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

October 7, 2011

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 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 01-92; Rules and Regulations Implementing the Truth in Caller ID Act of 2009, WC Docket No. 11-39

Dear Ms. Dortch:

On Wednesday, October 5, 2011, the undersigned on behalf of the National Telecommunications Cooperative Association, together with Bob Gnapp and Colin Sandy from the National Exchange Carrier Association (“NECA”), Steve Pastorkovich from the Organization for the Promotion and Advancement of Small Telecommunications Companies and Derrick Owens from the Western Telecommunications Alliance (collectively, the “Rural Representatives”) met with Terry Cavanaugh, Margaret Dailey and Chris Killion from the Enforcement Bureau, John Healy of the Public Safety and Homeland Security Bureau, and Bill Dever and Richard Hovey of the Wireline Competition Bureau to discuss continuing concerns with respect to call routing and termination.

The Rural Representatives identified several scenarios that appear to arise in the context of call routing and termination problems: (1) the call never reaches the end office switch of the carrier serving the called party or even the tandem switch to which the end office subtends; (2) the call rings 15 to 16 times for the calling party before ringing for the customer on the receiving end; and (3) the call can be answered, but the called party cannot hear the calling party speaking. The Rural Representatives further discussed their understanding of the role that VoIP gateways used by intermediate service providers and routing tables used by interexchange carriers (“IXCs”) play in this process, and the fact that frequent updates to routing tables often appear to reintroduce problems that may have been resolved several days earlier after significant troubleshooting efforts.

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The Rural Representatives also discussed how difficult it can be to track down appropriate and/or helpful contacts to obtain trouble resolution within some IXC organizations.

The Rural Representatives also responded to several questions presented by FCC staff during other meetings on the issues and discussed the attached summary of NECA's recent Test Call Project. The summary was provided to Commission staff to facilitate this discussion and includes carrier identifying information that NECA requests to remain confidential; a redacted copy is filed herewith, and a confidential version is provided under seal.

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 do not hesitate to contact me at (703) 351-2020 or jcanfield@ntca.org

Respectfully submitted,

/s/ Jill Canfield
Jill Canfield

Director, Legal & Industry

Attachment

JC:rhb

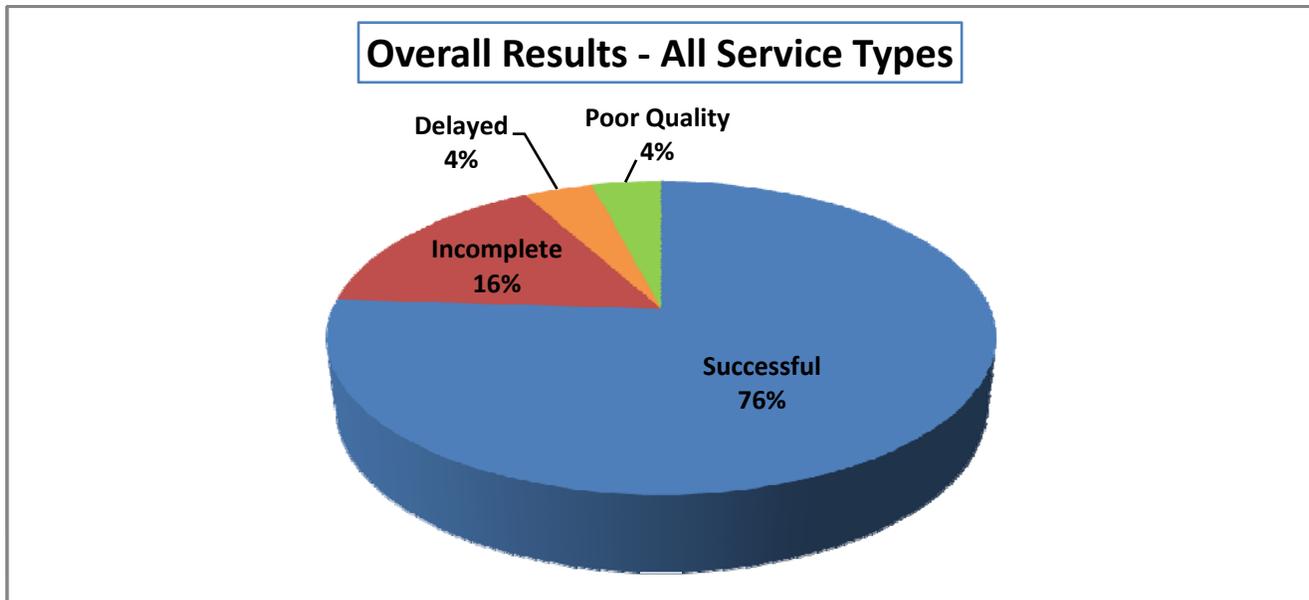
cc: Terry Cavanaugh
Margaret Dailey
Chris Killion
John Healy
Bill Dever
Richard Hovey

NECA Test Call Project - Summer 2011

Summary of Call Completion & Call Quality Results

Project Overview

- 2,150 test calls were made using various long distance carriers, wireless carriers, and VoIP providers.
- Participants originated calls from 16 states and terminated calls to test lines in 22 states.
- All terminating test lines were located in rural ILEC exchanges.



Overall Results & Results by Originating Service Type

	# of Calls	Successful	Incomplete	Delayed	Poor Quality
All Service Types	2,150	76%	16%	4%	4%
IXC	1,564	79%	13%	3%	5%
Wireless	333	85%	7%	5%	3%
VoIP	253	40%	45%	10%	5%

Definitions

Successful: Completed calls with no delay and no voice quality issues reported.

Incomplete: Calls which did not complete due to ring no answer, no ring, intercept message, etc..

Delayed: Completed calls with delayed setup (i.e. extended dead air before ring-back).

Poor Quality: Completed calls with poor voice quality (e.g. choppy, voice delay, one-way audio, echo, etc.).

Note: Results include a follow-up call by some test call participants after a failed attempt. This is consistent with the real world practice of redialing the called party's number after a call fails to go through on a first attempt.

NECA Test Call Project - Summer 2011
Summary of Call Completion & Call Quality Results

Results by Originating Carrier/Service Provider

	Service Type	# of Calls	Successful	Incomplete	Delayed	Poor Quality
Carrier/provider A	IXC	235	89%	9%	1%	1%
Carrier/provider B	IXC	116	74%	14%	9%	3%
Carrier/provider C	IXC	210	74%	12%	2%	12%
Carrier/provider D	IXC	29	79%	10%	7%	4%
Carrier/provider E	IXC	659	81%	14%	2%	3%
Carrier/provider F	IXC	28	96%	0%	0%	4%
Carrier/provider G	IXC	196	68%	25%	4%	3%
Carrier/provider H	IXC	91	76%	6%	9%	9%
Carrier/provider I	Wireless	40	65%	32%	0%	3%
Carrier/provider J	Wireless	95	92%	3%	4%	1%
Carrier/provider K	Wireless	59	88%	2%	5%	5%
Carrier/provider L	Wireless	50	92%	8%	0%	0%
Carrier/provider M	Wireless	89	83%	1%	11%	5%
Carrier/provider N	VoIP	49	80%	18%	0%	2%
Carrier/provider O	VoIP	43	42%	40%	9%	9%
Carrier/provider P	VoIP	58	33%	64%	0%	3%
Carrier/provider Q	VoIP	57	30%	67%	0%	3%
Carrier/provider R	VoIP	46	17%	28%	48%	7%