



1634 Eye Street NW
Suite 510
Washington, D.C. 20006

Colin Sandy
Government Relations Counsel
PH 202-682-2496
FX 202-682-0154
csandy@neca.org

November 15, 2012

Ex Parte Notice

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

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, November 14, 2012, the undersigned and Bob Gnapp on behalf of the National Exchange Carrier Association (NECA) together with Steve Pastorkovich from the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO); Derrick Owens from the Western Telecommunications Alliance (WTA), and Jill Canfield from the National Telecommunications Cooperative Association (NTCA), via telephone, (collectively, Rural Representatives) met with Terry Cavanaugh, Margaret Dailey, Chris Killion, Theodore Marcus and Erica Walker from the Enforcement Bureau; Bill Dever and Richard Hovey of the Wireline Competition Bureau, and John Healy for the Public Safety and Homeland Security Bureau to discuss results of the group's recent joint call completion survey.

In particular, the group discussed its joint call completion survey conducted to determine the volume of consumer complaints related to calls to rural areas not being successfully terminated. More than 200 rural local exchange carriers in 39 states responded to the survey, which was conducted over a three-week period in October 2012.

The survey found that despite consumers' growing frustration with persistent problems receiving calls and their declining likelihood to report occurrences, volumes of complaints related to call completion are steady or rising in 62 percent of respondents' service areas when comparing complaints during the months of March 2012 through

September 2012 and a previous testing period of August 2011 through February 2012. While a comparison of complaint volumes during both seven-month periods shows modest improvement for some respondents' service areas, call completion issues continue to occur at alarming rates, further highlighting the need for better enforcement of existing rules governing essential communications services and new solutions to combat this mounting epidemic.

The Rural Representatives responded to several questions presented by FCC staff regarding the attached summary of NECA's test call project. This 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 attached, and a confidential version is provided under seal.

The Rural Representatives also discussed planning that is underway for a collaborative test call project among rural carriers and members of the Alliance for Telecommunications Industry Solutions (ATIS). While details are still being finalized, the test call project is designed to identify and trouble-shoot call completion problems in real time.

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 (202) 682-2496 or csandy@neca.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Sandy". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Attachment

cc: Terry Cavanaugh
Margaret Dailey
Chris Killion
Bill Dever
John Healy
Richard Hovey
Theodore Marcus
Erica Walker

October 2012 Rural Call Completion Survey Results

Respondent Overview

Number of companies responding: **209**

States represented: **39**

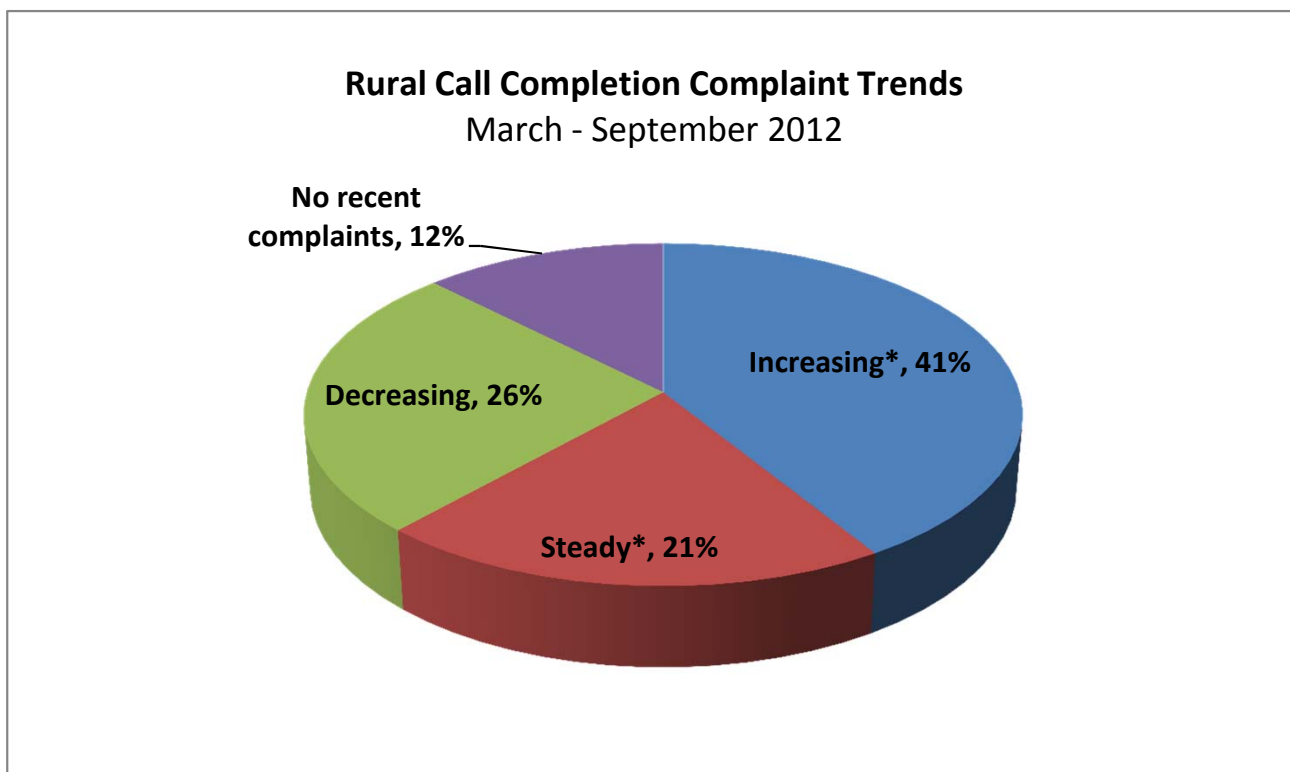
States where respondents reported complaints: **38**

Number of reported complaints March-August 2012: **4,691**

(Note, unlike the April 2011 survey, complaints were only reported where the originating carrier is known.)

Question #1 - Overall Trend:

Indicate the frequency of customer call completion complaints received during the last 7 months (March 2012 through September 2012) when compared to complaints received during the prior 7 months (August 2011 through February 2012).



*Complaint volumes are steady or getting worse in 62% of respondents' service areas despite decreasing consumer likelihood to report complaints.

October 2012 Rural Call Completion Survey Results

Question #2 (Carrier Specific Responses) - List each carrier known to have originated calls to your subscribers that resulted in a customer call completion complaint during the period **March 2012 through August 2012**.

Most cited originating carriers

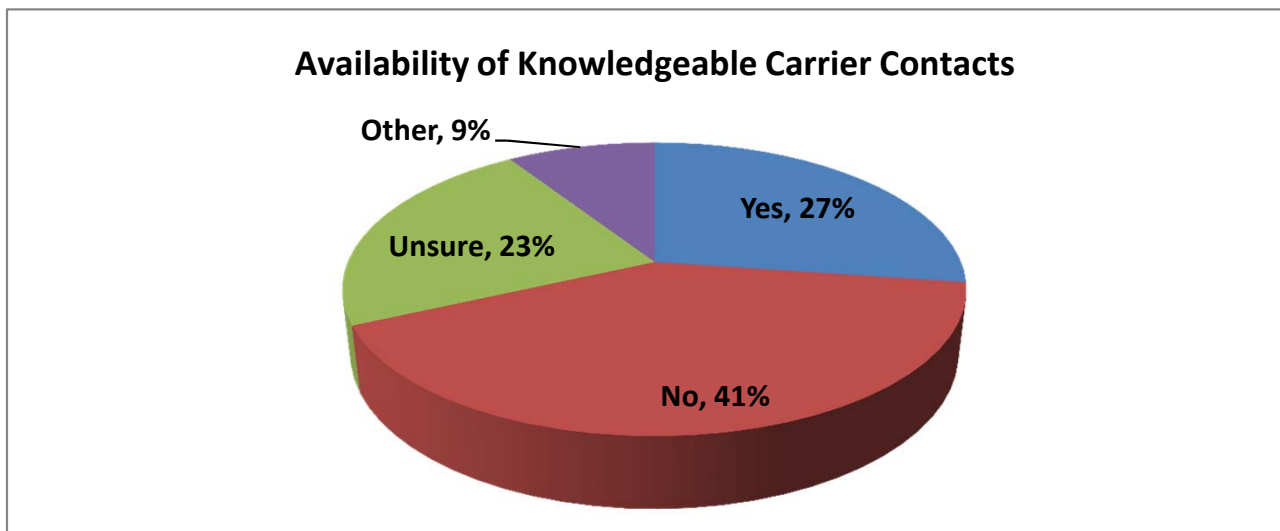
<i>Carrier Type</i>	<i>Carrier</i>	<i>Times Cited*</i>	<i>Number of Complaints</i>
<i>IXC</i>	Carrier A	33	289
	Carrier B	20	265
	Carrier C	15	436
	Carrier D	12	509
<i>Wireless</i>	Carrier E	33	842
	Carrier F	20	263
	Carrier G	13	117
<i>Fixed VoIP</i>	Carrier H	15	134
	Carrier I	11	49
	Carrier J	7	63
	Carrier K	6	13
<i>Nomadic VoIP</i>	Carrier L	6	176
	Carrier M	5	112

*Number of respondents reporting at least one complaint for this carrier.

October 2012 Rural Call Completion Survey Results

Question 2a - Did this carrier identify a specific contact point that is knowledgeable about rural call completion issues?

All responses



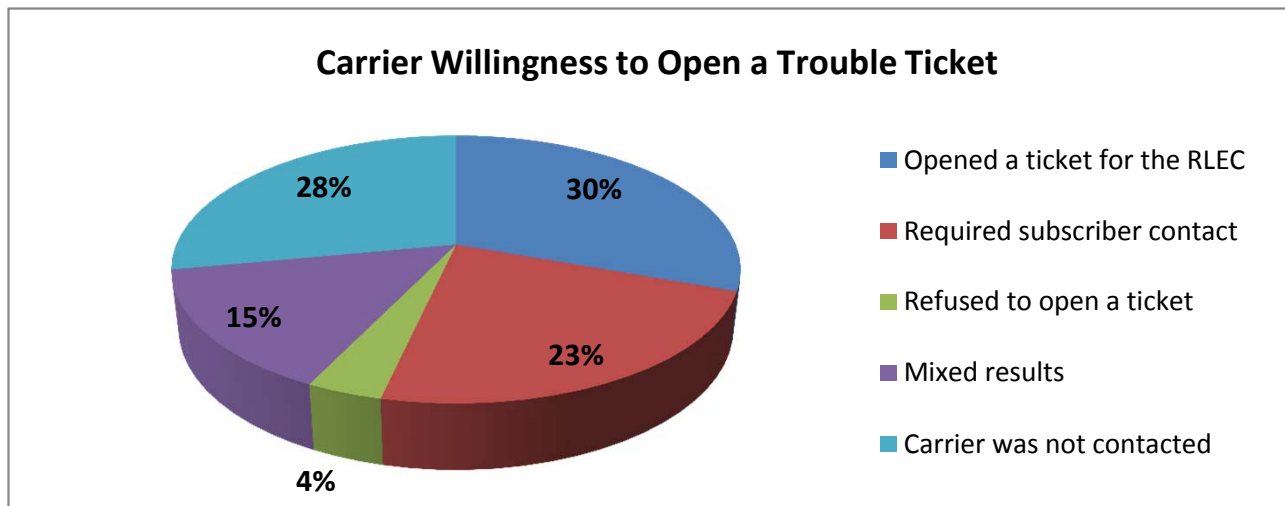
Most cited originating carriers

<i>Carrier Type</i>	<i>Carrier</i>	<i>Yes</i>	<i>No</i>	<i>Unsure</i>	<i>Other</i>
IXC	Carrier A	36%	42%	21%	0%
	Carrier B	15%	45%	25%	15%
	Carrier C	7%	60%	20%	13%
	Carrier D	33%	58%	8%	0%
Wireless	Carrier E	16%	44%	38%	3%
	Carrier F	26%	37%	37%	0%
	Carrier G	38%	31%	15%	15%
Fixed VoIP	Carrier H	40%	27%	27%	7%
	Carrier I	45%	36%	9%	9%
	Carrier J	43%	29%	29%	0%
	Carrier K	0%	50%	50%	0%
Nomadic VoIP	Carrier L	0%	83%	17%	0%
	Carrier M	0%	75%	0%	25%

October 2012 Rural Call Completion Survey Results

Question 2b – Were you able to open a trouble ticket with the originating carrier?

All responses



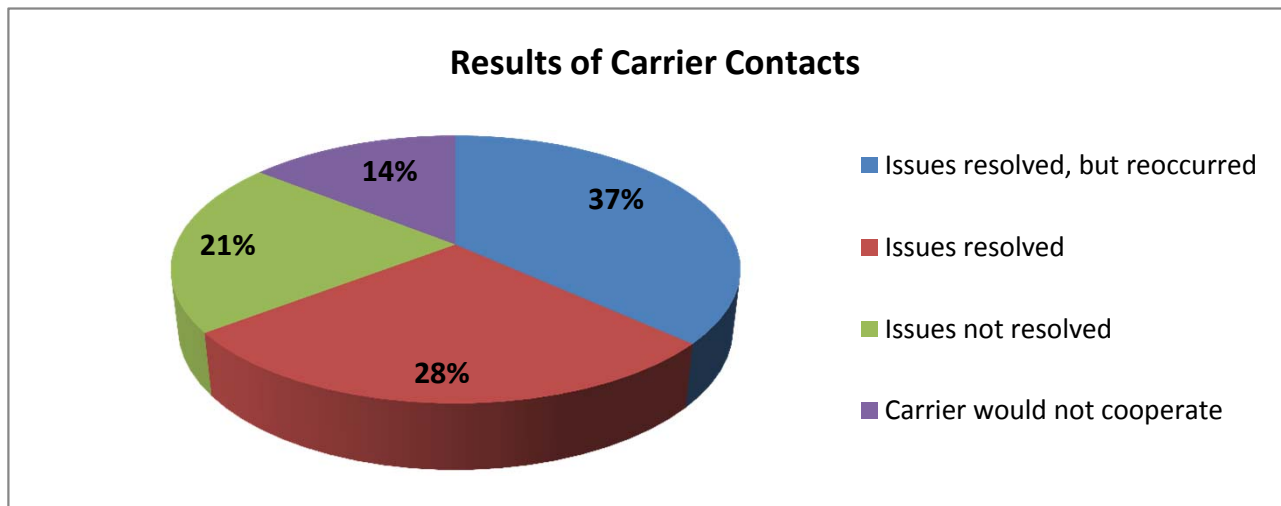
Most cited originating carriers

<i>Carrier Type</i>	<i>Carrier</i>	<i>Opened a trouble ticket for the RLEC</i>	<i>Required contact with their own subscriber</i>	<i>Refused to open a ticket</i>	<i>Mixed results</i>	<i>Carrier was not contacted</i>
IXC	Carrier A	36%	24%	6%	12%	21%
	Carrier B	21%	21%	11%	21%	26%
	Carrier C	7%	21%	0%	21%	50%
	Carrier D	58%	17%	0%	8%	17%
Wireless	Carrier E	18%	36%	3%	12%	30%
	Carrier F	21%	58%	0%	11%	11%
	Carrier G	46%	23%	0%	8%	23%
Fixed VoIP	Carrier H	57%	7%	0%	14%	21%
	Carrier I	45%	0%	0%	9%	45%
	Carrier J	29%	29%	0%	29%	14%
	Carrier K	0%	33%	0%	33%	33%
Nomadic VoIP	Carrier L	20%	20%	20%	20%	20%
	Carrier M	0%	0%	50%	0%	50%

October 2012 Rural Call Completion Survey Results

Question 2c – What was the response/result of company contacts with the originating carrier?

All responses



Most cited originating carriers

<i>Carrier Type</i>	<i>Carrier</i>	<i>Issues resolved</i>	<i>Issues resolved, but reoccurred</i>	<i>Issues not resolved</i>	<i>Carrier would not cooperate</i>
IXC	Carrier A	44%	25%	25%	6%
	Carrier B	20%	40%	20%	20%
	Carrier C	33%	17%	33%	17%
	Carrier D	44%	11%	44%	0%
Wireless	Carrier E	18%	35%	29%	18%
	Carrier F	9%	45%	27%	18%
	Carrier G	38%	63%	0%	0%
Fixed VoIP	Carrier H	43%	29%	29%	0%
	Carrier I	50%	25%	25%	0%
	Carrier J	0%	50%	25%	25%
	Carrier K	100%	0%	0%	0%
Nomadic VoIP	Carrier L	33%	0%	0%	67%
	Carrier M	0%	0%	0%	100%