

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter)
) **WC Docket No. 13-39**
Rural Call Completion)

COMPTEL’S COMMENTS SUPPORTING CLARIFICATION

COMPTEL, through undersigned counsel, hereby responds to the Commission’s request for comments¹ on whether additional guidance or clarification would be helpful to originating long distance service providers required to report call completion information pursuant to the rules recently adopted in the above-captioned proceeding.² Clarification and guidance are necessary to eliminate the confusion caused by the specific ISUP cause codes and corresponding SIP Response messages included in the Legend of the Reporting Template that the new rules require originating providers to complete and submit to the Commission on a quarterly basis.

In an effort to gather data on rural call completion rates, the new rules require certain originating long distance providers to separately report by rural Operating Company Number (“OCN”) the total number of long distance calls attempted to the rural OCN and the respective numbers of those attempted calls that were answered, the phone rang but was not answered, the line was busy, and the number called was unassigned. Similar information must also be

¹ Public Notice, “Wireline Competition Bureau Seeks Comment on Whether to Clarify Appendix C of the Rural Call Completion Order,” WC Docket No. 13-39, DA 14-526 (rel. Apr. 21, 2014).

² *In the Matter of Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-135 (rel. Nov. 8, 2013) (“Report and Order”).

reported on an aggregate basis for calls to non-rural exchanges.³ The Commission developed a Reporting Template that providers are to use when submitting their call completion data to the Commission.⁴ The Reporting Template includes a Legend specifying the ISUP cause codes and corresponding SIP Response messages that providers are to use in categorizing calls as Answered, Busy, Ring No Answer and Unassigned Number.

The Commission believes the call completion reporting requirements will “substantially increase [its] ability to monitor and redress problems associated with completing calls to rural areas.”⁵ The methodology the Commission instructs originating providers to use in categorizing calls for reporting purposes, however, is not currently used by the industry in the manner specified by the Commission. To the extent that the Commission is going to identify particular ISUP cause codes for originating long distance providers to use in categorizing their customers’ calls and call attempts, specifying the proper cause codes for each category is critical to accurate and meaningful reporting. The industry standards body, ATIS, has stressed the importance of properly using cause codes:

Cause codes, tones and announcements play an important role in call completion. On the one hand, they are key to the identification (and thus resolution) of network problems and, on the other, their misuse may exacerbate problems. Rural telephone companies have reported instances in which a busy tone or number-not-in-service announcement has been delivered to callers when, in fact the number was in service and was not engaged. Such signals, when erroneously applied, not only mislead the caller but may mask call completion problems from detection by the caller’s long distance provider.⁶

³ *Id.* at ¶¶ 65-66.

⁴ *Id.* at Appendix C.

⁵ Report and Order at ¶19.

⁶ ATIS Standard on Inter-carrier Call Completion/Call Termination Handbook, ATIS-0300106, at §4.1.2.

It has been brought to the Commission's attention that categorizing calls consistent with certain of the ISUP values specified in Appendix C for Answered Calls and Ring No Answer calls may result in inaccurate reporting of call data.⁷ COMPTTEL members share these concerns. In order to resolve any ambiguities before reports are filed, the Commission should request additional comment and undertake a thorough review of all of the cause codes identified in the Reporting Template Legend, including those for Busy and Unassigned Number, before determining which, if any, are appropriate for the categorization of calls as Answered, Ring No Answer, Busy and Unassigned Number for reporting purposes. If the Commission's goal is to obtain accurate measures of Call Answer Rates and Network Effectiveness Ratios, it must make every effort to ensure that providers consistently and uniformly record and categorize calls originating on their networks.

One of the difficulties with categorizing calls using the limited set of ISUP cause codes specified in the Legend is that the definitions for some of the cause codes do not necessarily indicate whether the call was completed to the terminating ILEC. For example, the Commission has defined "Answered Call" to mean a call answered by or on behalf of the called party, "causing the network to register that the terminating party is prepared to receive information from the calling user."⁸ The ISUP cause codes specified by the Commission to designate Answered Calls -- ISUP cause codes 16 and 31 -- are returned for calls that *clear normally*, whether or not they were answered by or on behalf of the called party.⁹ As the Commission

⁷ See Public Notice.

⁸ Report and Order at ¶72.

⁹ ATIS Standard on Next Generation Interconnection Interoperability Reference Document, Attachment H, SS7 Cause Codes and Tones and Announcements, ATIS-0300019 at Section 9.

recognized in the Public Notice, ISUP 16 may be returned for calls where the calling party hung up before the called party answered.¹⁰ Calls that are answered may also be returned with a cause code other than ISUP 16 or 31, such as when an intercept message that did not otherwise impact the completion of the call is delivered by the terminating ILEC. Thus, categorizing as “Answered” those calls, and only those calls, returned with ISUP cause codes 16 and 31 will not accurately reflect the number of calls actually answered by or on behalf of the call party.

As another example, the Reporting Template Legend designates ISUP cause codes 18 and 19 to categorize calls as “Ring No Answer.” Use of those codes alone, however, would not distinguish between calls where the caller actually heard ringing before hanging up and calls where the caller heard a recorded announcement from the terminating ILEC before hanging up.

Similarly, the Reporting Template Legend specifies that only ISUP cause code 17 is to be used for “Busy” calls. The Commission acknowledged that busy signaling may reflect network problems rather than that a call was completed to the terminating ILEC and signaled as busy.¹¹ In addition, use of only ISUP cause code 17 would not account for other situations where a call is completed to the terminating ILEC, but is rejected. ISUP cause code 21 (“Call Rejected”) is sent by equipment that does not wish to accept a call even though it could have accepted the call and the called party’s line is not busy.

Finally, the Reporting Template Legend specifies that only ISUP cause code 1 should be used for Unassigned Number. Use of this single ISUP cause code would not account for situations where the calling party misdialed (ISUP 28 – Invalid Number Format) or where the number was dialed correctly, but has been changed (ISUP 22 – Number Changed).

¹⁰ Public Notice at 2.

¹¹ Report and Order at ¶43.

Rather than create the potential for the reporting of inaccurate information and higher (or lower) call completion rates than may be warranted, the Commission should eliminate the specific ISUP cause codes included in the Reporting Template Legend and solicit further comment on the code definitions and their uses in order to develop more precise instructions that will enable originating providers to capture the information the Commission wants reported and report call completion data in the most accurate and meaningful way. Pending the issuance of such clarifying instructions, the Commission should delay the effective date of the record keeping and reporting rules.

If delay is not an option, the Commission must avoid the conflict created by the ISUP cause codes specified in the Legend by deleting that text from the Reporting Template while it considers alternatives. There is no reason to maintain, even on an interim basis, what were clearly intended to be helpful, explanatory instructions in the Legend when compliance with those instructions may cause providers to report call termination information inaccurately and/or inconsistently. The Commission did not seek comment on the appropriate ISUP cause codes to be used in categorizing calls as Answered, Busy, Ring No Answer and Unassigned Number prior to adopting the Reporting Template. Deleting the specific ISUP cause codes currently listed in the Legend of the Reporting Template calls will afford providers the necessary flexibility to correctly report their call completion rates. At the very least, the Commission must clarify that the definition of Answered Call in the Report and Order controls and that calls must be categorized in a manner consistent with the Commission's intent to generate the data necessary to determine originating providers' rural call completion rates. Providers should be allowed to categorize calls as answered in a manner consistent with industry practice, such as those calls for

which the providers receive an ISUP Answer Notification Message (ANM) or the SIP equivalent or calls for which they register billable minutes.

The data collection and reporting requirements imposed by the Commission's new rules have not yet been approved by the Office of Management and Budget. As a result, the filing deadline for the first call termination report has not yet been established. The Commission should use this opportunity to clear up any confusion in the reporting requirements that may arise from the ISUP release codes specified in the Legend of the Reporting Template by requesting additional comment and issuing additional guidance. In the meantime, the Commission should delete those codes from the Legend of the Reporting Template in an effort to facilitate accurate and consistent reporting by providers.

For the foregoing reasons, COMPTTEL respectfully requests that the Commission seek additional comment in order to provide necessary guidance to promote the proper categorization of calls on the Reporting Template. The effective date of the reporting rules should be held in abeyance until such guidance is issued. If delay is not an option, the Commission should delete the reference to the specific ISUP cause codes in the Reporting Template Legend and clarify and confirm that providers should report call information consistent with industry practice and the language of the Report and Order.

Respectfully submitted,

/s/

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