



Call Termination Issues

Presented by:

Bob Gnapp

Director–Demand Assurance & Network Analysis

(800) 892-3322

rgnapp@neca.org

Agenda

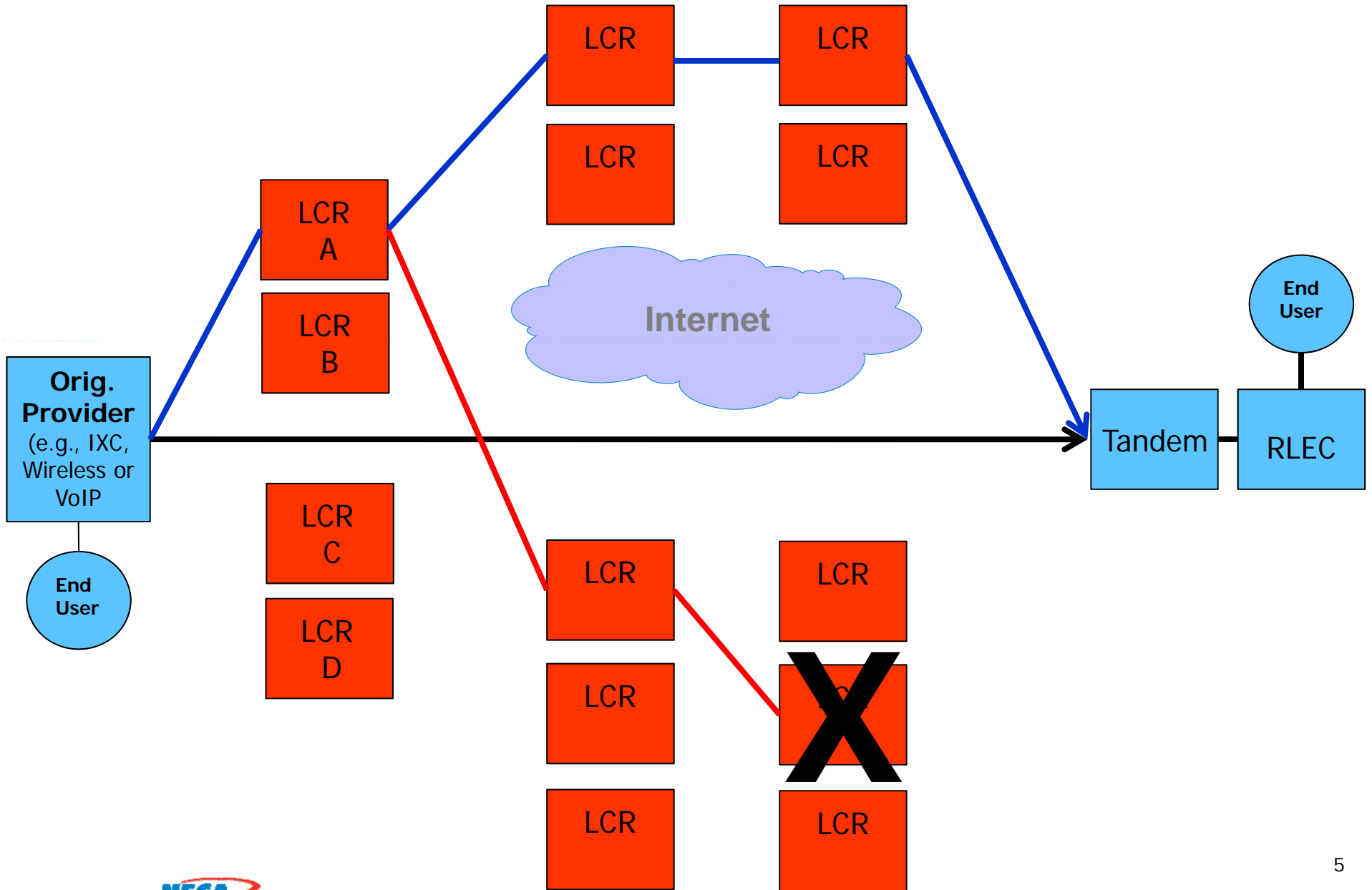
- The problem
 - Scope
 - Suspected causes
 - Effect
- Addressing the problem
- Legal issues
- Association efforts
- Questions and answers

The Problem

- Customers in rural areas are reporting increasing difficulty receiving long distance calls
- ★ ■ Calling party hears ringing, called party hears nothing
 - Unusually long call set-up
 - Called party's phone rings but hears dead air when the call is answered
 - Extremely poor quality on answerable calls/FAXs
 - Incorrect or misleading call intercept messages

The Problem

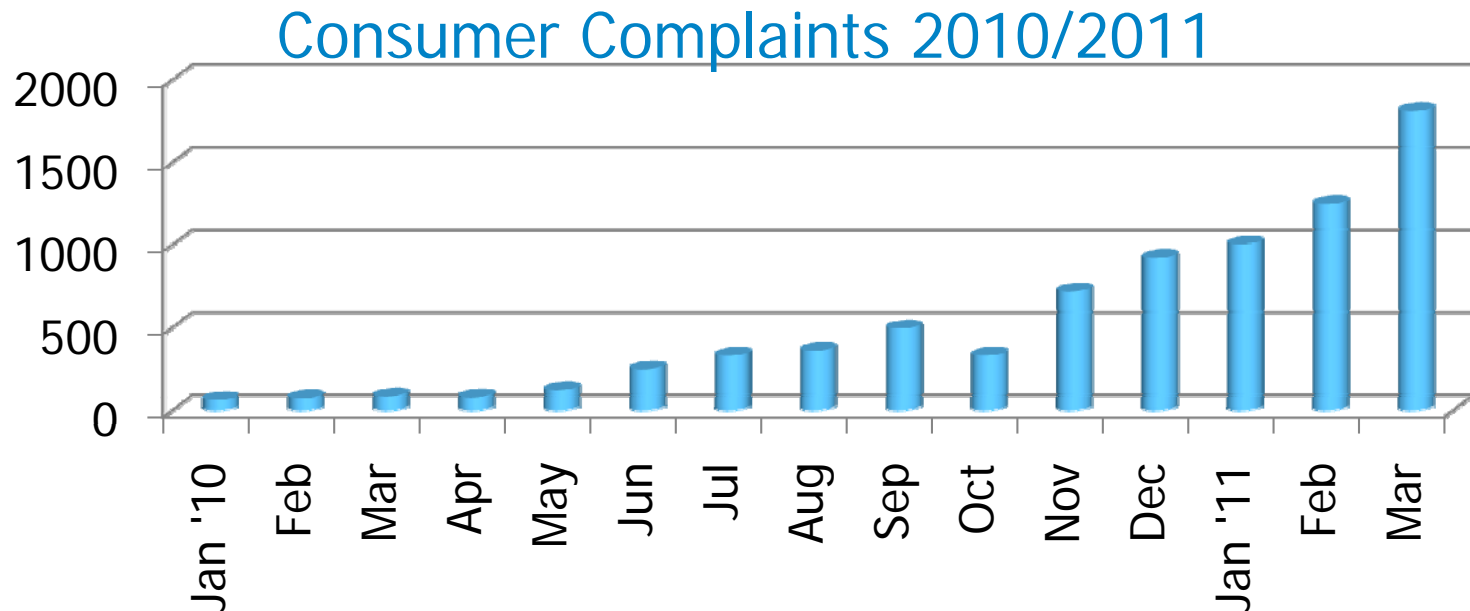
- Customers in rural areas are reporting increasing difficulty receiving long distance calls (cont'd)
 - Calls originate from traditional long distance carriers, wireless carriers and VoIP providers
 - Interstate and intrastate calls
 - Most affected calls reportedly involve one or more Least Cost Routing (LCR) provider



The Problem

Scope

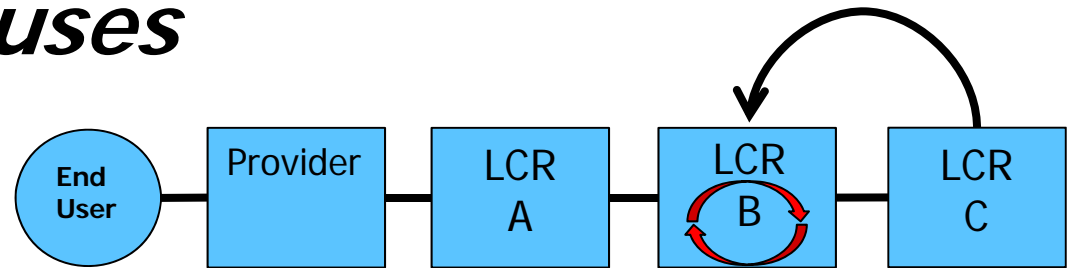
- A “national epidemic”
 - More than **80%** of survey respondents indicated they had received complaints **35 states**
 - More than **10,000** documented complaints
 - Tip of the iceberg



The Problem

Suspected Causes

- Routing loops



- Improper network management or setup
- Originating carriers routing calls to LCR providers whose contracts stipulate they will not complete calls to certain NPA-NXXs
- Providers unwilling to terminate calls to certain areas

"We are working on interconnecting with the telecommunications carrier for the telephone numbers you have been unable to reach. The current rates charged by (the terminating) carriers are cost prohibitive" - MagicJack

The Problem Effect

- Wasted resources and loss of good will
 - *“Countless hours of trouble shooting and needlessly replacing equipment we determined that this was a trouble with the inbound call itself”*
 - *“Many customers were upset with us, especially our business customers, because they believed and were told from the party calling them that the issue was in our network. However, this has never been the case to this point in time”*
 - *“These issues can be common in rural areas as the terminating Local Exchange Carrier often has minimal capacity to handle the traffic over their network” – Vonage (complaint response)*
 - *“ We lost several business customers because of it.”*

The Problem

Effect

- Public safety, homeland security, and economic well-being in rural America are threatened
 - *“ This is a vital issue for elderly who live alone. Their family cannot reach them to check on them!”*
 - A public safety notification system in South Dakota intended to notify parents of school alerts was unable to complete calls placed from a distant location.
 - A state police barracks has threatened to move, citing its inability to receive critical calls
 - A retail firm invoiced its rural LEC for more than \$50,000, citing lost sales

Addressing The Problem

- Resolution is out of the RLEC's direct control
 - Most calls never reach the terminating end



- Numerous logistical and operational barriers exist
- Originating provider cooperated with the RLEC to resolve the problem only about half the time
 - RLECs encourage the **calling party** to file a trouble ticket directly with the originating carrier

Addressing The Problem

- The majority of complaints that are addressed, recur
- *“The carrier tells us they reroute the calls, and they work, but within 2 weeks they stop working.”*
 - New rate deck issued
 - Periodic routing table resets

Legal Issues

- Is there a violation of the law?
 - Duty of common carrier to furnish communication service
 - Unjust and unreasonable discrimination
- Is there a violation of FCC rules?
 - De facto call blocking
 - Access charge avoidance/impermissible self help
 - Spoofing

Association Efforts

- **January 2011** - Brief mention of issue during FCC meeting
 - Staff interested and requested more information
- **February 2011** – Association survey to determine scope of the problem
- **March 2011** - NECA, NTCA, OPASTCO, WTA and member companies met with FCC Pricing Policy Division and Enforcement Bureau

Association Efforts

FCC Meeting

- Pricing Policy Division suggested industry solution
 - FCC rulemaking process takes too long
 - Suggested industry solution
- Enforcement Bureau asked for more information

Association Efforts

FCC Meeting Follow-Up

- April 2011 - Second survey of membership
 - How many complaints?
 - Describe problem by originating carrier
 - What has been done to resolve the problem?

Association Efforts

FCC Meeting Follow-Up

- **June 2011** – Communicated survey results to FCC Enforcement Bureau
 - Who is involved, description of problem, allegation of statute or rules violated
 - Formally requested investigation
- **July 2011** - FCC “summoned” named carriers
 - Stimulated some intercarrier carrier communications

Association Efforts

FCC Meeting Follow-Up

- August 2011 – Follow-up to gage effect of efforts – Mini survey
 - Results mixed
 - A few originating carrier contacted RLECs
 - Two carriers show significant improvement
- Follow-up Ex Parte scheduled for this week

QUESTIONS & ANSWERS