

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

**COMMENTS OF THE ALLIANCE FOR  
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Next Generational Interconnection Interoperability Forum (NGIIF), hereby submits these comments in response to *Second Further Notice of Proposed Rulemaking (Second FNPRM)*, released July 14, 2017, in the above-referenced docket. As a key stakeholder in the development of technical and operational standards pertaining to rural call completion, ATIS is pleased to have the opportunity to respond in this proceeding.

**I. BACKGROUND**

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for the technology information, entertainment, and communications industries. ATIS' nearly 200 member companies are currently working to address 5G, cybersecurity, the All-IP transition, network functions virtualization, smart cities, IoT, emergency services, the network's evolution to content-optimized networks, quality of service, billing support, operations, unmanned aerial vehicles, and much more. ATIS is accredited by the American National Standards Institute

(ANSI) and is the North American Organizational Partner for the 3rd Generation Partnership Project (3GPP), a founding Partner of the oneM2M global initiative, a member and major U.S. contributor to the International Telecommunication Union (ITU), as well as a member of the Inter-American Telecommunication Commission (CITEL).

ATIS NGIIF provides an open forum to encourage the discussion and resolution of industry-wide issues associated with the operational aspect of telecommunications network interconnection and interoperability, and the exchange of information concerning relevant topics, such as network architecture, management, testing and operations, and facilities.

## II. COMMENTS

ATIS appreciates the opportunity to provide its input to the *Second FNPRM*. As the Commission is aware, ensuring reliable communication is a core focus of ATIS' work and ATIS NGIIF has been effectively working to address call completion issues for many years. This work included an evaluation of the scope and cause(s) of call completion problems that had been reported by some carriers, including in particular rural carriers.<sup>1</sup> This work also resulted in the development by ATIS NGIIF of its *Intercarrier Call Completion/Call Termination Handbook* that addresses call completion issues; this handbook was developed collaboratively with input from rural carriers.<sup>2</sup> This handbook includes Best Practices and other guidance that, if followed, could help to mitigate call completion issues. ATIS NGIIF continues to examine this issue and to consider appropriate updates to the handbook, which is currently in its second edition. In May

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<sup>1</sup> Neither ATIS nor the Commission was able to definitely identify a root cause(s) for these problems. ATIS notes that in the June 2017 Report (DA 17-595) the Commission notes that "rural call completion may be more a function of individual provider performance than a systemic problem."

<sup>2</sup> This document is available for electronic download at no charge from ATIS' Document Center at <https://www.atis.org/docstore/product.aspx?id=26780>.

2017, NGIIF opened a new work item to consider potential updates to this handbook. ATIS continues to welcome input from rural carriers on this matter.

While call completion remains a concern and focus of industry work, ATIS is pleased that the significant work already completed by the industry has helped to mitigate rural call completion problems. The Commission notes in the *Second FNPRM* that rural call completion complaints have decreased by 57% from 2015-2016.<sup>3</sup> ATIS believes this reduction in consumer complaints is in no small part due to the significant work by the industry to provide guidance and identify Best Practices.

In the *Second FNPRM*, the Commission makes numerous references to the ATIS *Intercarrier Call Completion/Call Termination Handbook* and asks whether it should require covered providers to comply with some or all of the best practices found in this handbook.<sup>4</sup> While ATIS appreciates the Commission's acknowledgement of this important work, it urges the Commission not to transform this guidance into regulatory mandates. Best Practices are extremely important to the industry and, while they are generally widely adopted and implemented, they are not universally applicable and there are legitimate situations in which a Best Practice may not be implemented by a service provider, included but not limited to, the protection of networks and/or concern for customers' need.

Mandating Best Practices in addition to eliminating the flexibility necessary for service providers to meet network-specific demands and customer expectations, would have a negative effect on any effort to develop future, voluntary Best Practices. This was highlighted by the Commission's Network Reliability and Interoperability Council (NRIC) in 2005, which noted:

Mandated implementation of these Best Practices is not consistent with their intent. The appropriate application of these Best Practices can only be done by

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<sup>3</sup> *Second FNPRM*

<sup>4</sup> *Second FNPRM* at 19.

individuals with sufficient competence to understand them. Although the Best Practices are written to be easily understood, their meaning is often not apparent to those lacking experience and/or expertise in the specific job functions related to the practice. Appropriate application requires understanding of the Best Practice impact on systems, processes, organizations, networks, subscribers, business operations, complex cost issues and other considerations. With these important considerations' regarding intended use, the industry is concerned that government authorities may inappropriately impose these as regulations or court orders.<sup>5</sup>

The Commission also seeks comment on whether to impose any requirements on terminating carriers and seeks input on Comcast's previous recommendation that rural carriers be required to activate a test line in each of their end offices that originating and terminating carriers can use to conduct fully automated testing.<sup>6</sup> ATIS notes that the ATIS *Intercarrier Call Completion/Call Termination Handbook* recognizes the value of test lines, where available, in resolving call completion issues reported by the called party. Such lines can expedite trouble resolution, avoid Customer Propriety Network Information- related issues and exclude problems that may be specific to the called party's access and customer premises equipment arrangements.

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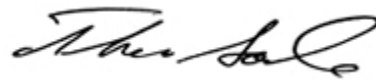
<sup>5</sup> Final Report of the NRIC VII Focus Group 2A, Homeland Security Infrastructure (December 2005), Section 3.

<sup>6</sup> *Second FNPRM* at ¶34.

### III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Second FNPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,



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