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May 27, 2014

Via Email

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

Re: Ex Parte Presentation
WC Docket No. 13-39

Dear Ms. Dortch:

In response to the Federal Communications Commission's *Public Notice*, released April 21, 2014, the Alliance for Telecommunications Industry Solutions (ATIS) submits the input below on behalf of its Next Generation Interconnection Interoperability Forum (NGIIF) and Packet Technologies and Systems Committee (PTSC), in the above-referenced docket.

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, digital rights management companies, and internet service providers.

The ATIS NGIIF provides an open forum to encourage the discussion and resolution of industry-wide issues associated with telecommunications network interconnection and interoperability, and the exchange of information concerning relevant topics, such as network architecture, management, testing and operations, and facilities. This input addresses, and is used to develop, operational procedures associated with these emerging technologies as well as next-generation network interconnection and interoperability issues that involve architecture, disaster preparedness, installation, maintenance, management, reliability, routing, security, and testing between network operators.

ATIS PTSC develops and recommends standards and technical reports related to services, architectures, and signaling. PTSC's work programs focus on issues such as Emergency Telecommunications Service (ETS), cybersecurity, IP-to-IP interconnection, lawfully-authorized electronic surveillance and the evolution of the PSTN. PTSC coordinates and develops standards and technical reports relevant to telecommunications networks in the U.S., reviews and prepares contributions for submission to U.S. ITU-T and U.S. ITU-R Study Groups or other standards organizations and reviews for acceptability or *per contra* the positions of other countries in related standards development organizations and takes or recommends appropriate actions.

In the *Public Notice*, the FCC seeks comment on Appendix C of the Rural Call Completion Order, which provides a spreadsheet that covered providers must use to file the required call completion data with the Commission and a legend that identifies ISUP Cause Codes and corresponding SIP Response Messages for various call categories. As the comments filed in response to the *Public Notice* make clear, there are varying approaches to categorizing calls as "answered" and "ring no answer" for the Reporting Template. Moreover, there is substantial evidence on the record that the Commission's focus on the reporting of call answer rates is misplaced and that call answer rates – however they are ultimately determined – will not reliably identify rural OCNs with call delivery issues. In particular, ATIS notes the following with respect to Appendix C:

- ISUP Cause Code 16. Cause Code 16 may be returned for "answered calls" as well as in situations when the calling party hangs up; this code also may be returned to indicate the release of an answered call in place of ISUP Cause Code 31 (normal release).
- SIP Response Message "BYE." While SIP "BYE" is normally sent on normal release of an answered call, it can also be sent after alerting but before answer and therefore may not always indicate that a call has been "answered."
- SIP Status Codes 408, 480. Due to misalignments with respect to the mapping of ISUP Cause Codes to SIP Status Codes and of SIP Status Codes to ISUP Cause Codes in the underlying standards, the meaning of SIP Status Code 408 and 480 may not be uniformly understood and may not always indicate "ring no answer" calls.

As noted in the comments, the *NPRM* did not seek public input on the appropriate codes and messages that may form the basis of covered providers' reports. Yet, as demonstrated by the instant issue, this is the type of issue that is best left to a collaborative process among industry stakeholders.

This collaborative process was successfully used by the industry to develop the *ATIS Intercarrier Call Completion/Call Termination Handbook* (ATIS-0300106)¹, which provides important guidance to telecommunications providers in mitigating call termination issues. The collaborative process has also been used by the industry to perform call completion testing. The results of this

¹ The handbook is publically available on a complimentary basis from the ATIS document center at: <https://www.atis.org/docstore/default.aspx>.

recently-completed testing will be used by the ATIS NGIIF to update the Call Completion Handbook as applicable. ATIS NGIIF is also looking at whether additional guidance would be useful related to the use of Cause Codes and call completion data.

In the interim, ATIS member companies support moving forward with the reporting process as illustrated in the Rural Call Completion Order, *i.e.*, Appendix C. ATIS stands ready to support the Commission's efforts to provide further guidance and clarity to the industry regarding the collection and reporting of call completion data.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is written in a cursive, flowing style.

Thomas Goode
ATIS General Counsel