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February 10, 2012

**VIA ELECTRONIC FILING**

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

Re: CC Docket No. 01-92 and WC Docket No. 07-135  
*Ex Parte* Presentation

Dear Ms. Dortch:

On February 8, 2012, representatives from the ATIS Next Generation Interconnection Interoperability Forum (NGIIF) met with representatives from the FCC Call Completion Task Force to provide an update on NGIIF's work on call completion issues.

During the meeting, ATIS provided a summary of aggregated data from its survey of rural carriers regarding call completion issues. ATIS also provided an update on the NGIIF's multi-phased work plan to address this issue, which includes the development of an industry handbook, the identification and/or development of industry standards or best practices, and the collection of additional data on call completion issues from other industry stakeholders. Attached is a presentation on the NGIIF's work plan on this issue.

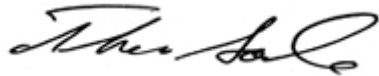
Attending this meeting on behalf of the FCC were representatives from the Wireline Competition Bureau (WCB), Public Safety and Homeland Security Bureau (PSHSB) and Enforcement Bureau (EB). The following were in attendance in person or via phone: Terry Cavanaugh, Acting Chief, Investigations and Hearings Division, EB; Jean Ann Collins, Deputy Division Chief, Communications Systems Analysis Division, WCB; Margaret Dailey, Attorney, EB; William Dever, Chief, Competition Policy Division, WCB; Sharon Gillett, Chief, WCB; Rebekah Goodheart, Associate Bureau Chief, WCB; John Healy, Associate Division Chief, Cybersecurity and Communications Reliability Division, PSHSB; Richard Hovey, Telecommunications Systems Specialist, Communications Systems Analysis Division, PSHSB; Christopher Killion, Attorney, EB; Travis Litman, Acting Legal Advisor, WCB; and Henning Schulzrinne, Chief Technology Officer.

Attending this meeting on behalf of the ATIS NGIIF were: Robin Meier, Sr. Tech Support Analysis Network, Global Engineering Support, Network Operations - Mobility, AT&T and NGIIF Co-Chair; Penn Pfautz, Director Product Development, AT&T Access Management; Veronica Lancaster, ATIS Director; and Tom Goode, ATIS General Counsel.

One copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

If there are any questions about this matter, please contact the undersigned.

Sincerely,

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

Thomas Goode  
General Counsel



# **Next Generation Interconnection Interoperability Forum (NGIIF)**

**Virtual Workshop**

After the Survey  
Handbook Action Plan

February 2, 2012



# After the Survey

- The NGIIF has determined common topics that were identified as concerns for rural carriers that responded to the NGIIF survey. We welcome additional input from rural carriers as we work through developing the handbook.
- These common topics became the initial content outline for the draft handbook.
- As work develops, topics may be refined, changed, or added to the handbook.
- Working text is currently being added to the handbook by the NGIIF during member meetings. Significant work is expected to take place at the NGIIF members' virtual meeting week, February 6-9, 2012.

# Development of Handbook

- The NGIIF created four initial major areas to address in the draft handbook based on common responses received from rural carriers.
  - Best Practices
  - Applicable Standards/Guidelines
  - Trouble Reporting/Contact Directories
  - Existing Regulatory Environment

# Best Practices

- The NGIIF has created a major section to address best practices that may help mitigate call completion/call termination problems.
  - A common concern identified by rural carriers was Least Cost Routing. Least Cost Routing underlying carrier management is an area in which the NGIIF plans to address best practices.
  - The NGIIF also plans to address best practices related to technical aspects of properly jurisdictionalizing traffic.

## Applicable Standards/Guidelines

- Given ATIS member companies are focused on the development of standards, guidelines, and solutions that create the future of the industry, applicable standards/guidelines is a major section that the NGIIF plans to develop in the handbook.
- In addition to listing current ATIS standards and guidelines, the NGIIF plans to identify standards and guidelines from other standards development organizations where applicable.

# Applicable Standards/Guidelines

- The following are sub-topics that the NGIIF plans to develop related content for:
  - Signaling
  - Transmission quality
  - Routing
  - Network congestion



# Signaling

- The NGIIF plans to include text from applicable standards and guidelines related to signaling. These include the following specific areas:
  - Caller ID
    - Spoofing
    - Bad/incorrect Caller ID
    - Absent Caller ID
    - Interactions with screening
  - Cause codes, tones and announcements
  - Looping
  - Call set-up
    - Calling party hears dead air
    - Call set-up delay
    - Delayed ringing or ringing without call set-up

# Transmission Quality

- The NGIIF plans to include text from applicable standards and guidelines related to transmission quality. These include the following specific areas:
  - Voice
    - One-way audio
  - Fax
  - Voiceband data

# Routing

- The NGIIF plans to include text from applicable standards and guidelines related to routing. These include the following specific areas:
  - Correct translations
    - Routing of area codes and NXXs
    - Toll free
    - Configuration issues
  - Looping
  - Call set-up issues
  - LNP implications

# Network Congestion

- The NGIIF plans to include text from applicable standards and guidelines related to network congestion.
- Specific sub-topics are in the process of being identified.

# Trouble Reporting/Contact Directories

- The NGIIF has created a major section to address trouble reporting and contact directories.
  - A common concern identified by rural carriers was trouble shooting and cooperation.
  - Some rural carriers identified a need for correct contacts within companies to work on call completion/call termination related problems.
  - The NGIIF currently plans for two sub-topics addressing trouble reporting and contact directories.

# Trouble Reporting

- The following are sub-topics of trouble reporting that the NGIIF plans to add and/or develop related content for:
  - Trouble reporting detection responsibilities and processes
    - Responsibilities
    - CPNI implications
    - Cooperative testing and testing equipment
    - Test scripts
    - Examples of trouble situations encountered
      - Samples of trouble situations
      - Bad facilities (trunks, lines, cables, equipment cards, facilities etc.)
    - Potential resolutions
    - Trouble report clearing information

# Contact Directories

- The following are sub-topics of trouble reporting that the NGIIF plans to add and/or develop related content for:
  - Identification and location on ATIS website
  - How to gain access
  - How to add or update contact information

# Existing Regulatory Environment

- The NGIIF is working on the technical related aspects of call completion/call termination problems in an effort to create a standards-based solution, but recognizes that there are existing regulations pertinent to call processing.
- The NGIIF created a major section addressing existing regulations in an effort to provide assistance and education to carriers when handling call completion/call termination problems.
- The NGIIF is not planning to comment on existing regulations in the guidelines, or efforts by other associations regarding the need for, or utility of, existing or new regulations; this section will provide a factual summary of existing regulations for information only.



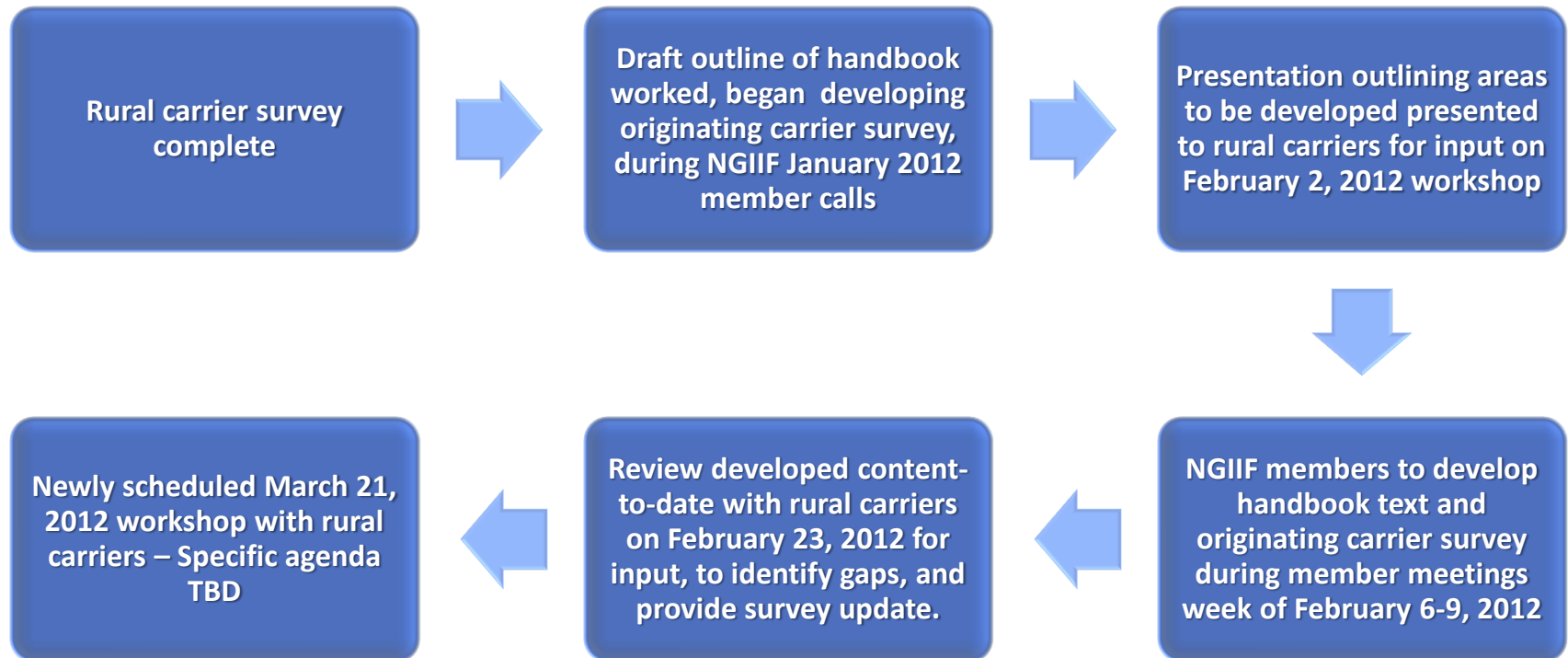
# Existing Regulatory Environment

- The following are sub-topics of the existing regulatory environment that the NGIIF plans to include or reference related content for:
  - Caller ID
  - Traffic delivery requirements
  - Jurisdictionalizing traffic
  - USF ICC order
  - CPNI rules

# Action Plan - Milestones

- The NGIIF plans to continue workshops with invited rural carriers to address the development of the handbook, identify gaps, etc.
  - February 23, 2012 – Review draft handbook as developed to date for input by rural carriers, identify additional work needed to complete handbook
  - March 21, 2012 – Review previously assigned action items and draft handbook as further developed by NGIIF (exact agenda TBD)
- The NGIIF plans to continue holding membership meetings to further develop content within the handbook.
  - February 6-9, 2012, NGIIF membership virtual meeting week (11:00 am – 5:00 pm ET daily)
  - Future conference calls expected to be scheduled from the February 6-9, 2012 virtual meeting week.
- The NGIIF plans to survey originating carriers to gather content from their perspective.
  - Draft questions are in the process of being developed.

# Action Plan Milestones





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