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January 18, 2012

VIA EMAIL

Federal Communications Commission
445 12th St., SW
Washington, DC 20554

James Arden Barnett, Jr.
Chief, Public Safety and Homeland Security Bureau

Sharon Gillett
Chief, Wireline Competition Bureau

Re: Initial Response to DA11-1985, December 6, 2011, Letter regarding
ATIS' Work pertaining to Call Termination Issues

Dear Chief Barnett and Chief Gillett:

This is to update you on the efforts of the Alliance for Telecommunications Industry Solutions (ATIS) to assist the Federal Communications Commission's Rural Call Completion Task Force in the evaluation of technical issues that may be relevant to the call termination issues that have been experienced by the industry.

As explained in our October 7 letter, ATIS, through its Next Generation Interconnection Interoperability Forum (NGIIF), has been actively examining this issue. The NGIIF, one of ATIS' sixteen member forums, addresses next-generation network interconnection and interoperability issues associated with emerging technologies. Currently, the following companies are members of the NGIIF: Alcatel-Lucent; AT&T; Bell Canada; CenturyLink; Hypercube; INDigital Telecom; IP Fabrics; Sprint Nextel; T-Mobile; TDS Telecom; Telcordia Technologies; and Verizon.

Since October, the NGIIF has undertaken significant efforts on this matter. The goal of this work is three-fold: (1) to determine if a root cause(s) for the problems can be isolated; (2) to develop industry standards, best practices and/or guidelines that may be necessary to address any identified cause(s); and (3) to develop an industry handbook with information on existing or new standards, best practices or guidelines that may mitigate or resolve the identified problem(s) with the intent of updating the handbook as new problems arise.

The first step is to gather information from those experiencing the problems. ATIS has completed its first phase of this effort. The NGIIF has prepared a survey aimed at collecting detailed information regarding call completion/call termination challenges being experienced. While some data had been collected previously by other organizations, the more detailed data was not made available to ATIS or its NGIIF. Further, ATIS' review of the publically available data determined that it was insufficient to identify the source of the issues.

Because the call termination issue was raised by rural carriers and their associations, ATIS' initial efforts have been focused on this segment of the industry. On November 10, ATIS met with associations representing rural carriers to explain the process that ATIS was initiating and to seek their feedback on the questions that would be asked in the survey. Input from this meeting was incorporated into the survey.

On December 8, ATIS NGIIF held a conference call to discuss its efforts thus far, the purpose for the industry survey, and the goal of the data collection effort. Approximately 2,400 rural carriers were invited to this call and about 85 participated in the call itself, in addition to rural associations and representatives from state public service commissions. During the call, ATIS also explained that the survey was only the first step in the process and that ATIS plans to use the data to both identify problems and to facilitate the development of an industry handbook on practices that may help mitigate known problem(s) as well as future problems that may arise.

The second step is to work on the issue(s) with input from rural carriers. ATIS has planned a February 2 virtual workshop to discuss issues raised during the December 8 call as well as the information collected in the survey. Of the 103 respondents to the NGIIF survey, 67 have agreed to participate in this workshop (because registration remains open until February 2, we may have more registrants). Additional workshops will be planned based on discussions at the initial workshop.

Concurrently with our work to identify the root cause(s), ATIS NGIIF has begun work on the development of best practices for intermediate telecom providers. A set of best practices has been proposed and is being reviewed by the NGIIF.

A rigid timeframe for the completion of ATIS' work has not been established. However, the ATIS NGIIF has made its work on this issue its top priority. ATIS will keep the Commission updated on its efforts and expected completion dates when information becomes available.

Finally, I note that your December 6 letter includes a list of questions regarding industry work pertaining to specific issues such as excessive call setup delay, call looping, and false audible ringing. While ATIS cannot speak definitively to the root cause(s) of the call termination issues, ATIS is collecting more detailed information regarding industry standards, guidelines and best practices related to call set up delay, call looping and false audible ringing. This information may include NGIIF documents as well as documents from other ATIS industry forums. From ATIS' initial review, it does appear that some of the best practices under consideration, in addition to existing standards and best practices, may be relevant to the resolution of the identified rural

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problems and to questions posed in your letter. This information will be provided as soon as it is available.

If you have any questions, please feel free to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Goode". The signature is fluid and cursive, with the first name being the most prominent.

Thomas E. Goode
ATIS General Counsel

cc: William Dever, Chief, Competition Policy Division, Wireline Competition Bureau