



Federal Communications Commission  
Washington, D.C. 20554

December 6, 2011

DA 11-1985

Thomas Goode  
General Counsel  
ATIS  
1200 G Street NW  
Washington DC 20005

Dear Mr. Goode:

Thank you for your letter of October 7, 2011, describing the work underway at ATIS on call termination issues affecting rural areas, and for the offer on behalf of the ATIS NGIFF to assist the Federal Communications Commission's Rural Call Completion Task Force in the evaluation of technical issues related to these call termination problems. The Commission considers the call termination issue to be a matter of serious concern, and we appreciate ATIS's prompt response to this letter to assist the Commission in evaluating, investigating and resolving the issue.<sup>1</sup>

First, we request an update on any efforts to coordinate with rural incumbent local exchange carriers to obtain the additional data that would allow ATIS to undertake more detailed study.<sup>2</sup>

Second, at the Commission's October 18, 2011, Rural Call Completion Workshop, AT&T proposed the development of Industry Best Practices for managing intermediate providers and similarly binding any of their suppliers through contractual or other means. Please provide information on any work by ATIS in connection with such best practices development, including the level and nature of active participation from the industry, the expected form and general timeframes for a deliverable item, and the nature of any contemplated contractual terms, and quality measures the Industry Best Practices may cover.

Finally, as ATIS has noted, rural customers "have experienced problems with their phone service, ranging from situations in which the calling party hears ringing but the called party hears nothing (or there is an unusually long call set-up), the called party's phone rings but the party hears dead air when the call is answered, or there is extremely poor quality on answerable calls."<sup>3</sup> The same concerns have been raised in meetings with the Commission.<sup>4</sup> Indeed, on

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<sup>1</sup> See <http://www.fcc.gov/document/fcc-launches-rural-call-completion-task-force-sets-oct-18-workshop>

<sup>2</sup> See Letter from Thomas Goode, General Counsel, ATIS, to Fred Goodwin, Senior Telecommunications Engineer, Oregon Public Utility Commission and Don Gray, Telecommunications Analyst, Nebraska Public Service Commission (Aug. 5, 2011). Available at <http://www.atis.org/legal/committee.asp#NGIIF>

<sup>3</sup> *Id.*

<sup>4</sup> See, e.g., Letter from Jill Canfield, Director, Legal & Industry, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 07-135 *et al.* (Oct. 7, 2011); Letter from Rural Telecommunications

several occasions over the past few months the Commission's Rural Call Completion Task Force staff have experienced these very same problems when attempting to contact certain rural incumbent local exchange carriers.

It appears that some of these call completion concerns may be attributable to the interworking of TDM- and IP-based technologies in today's current generation network and are under the control of originating carriers and intermediate providers within the call path. As a result, to help the Rural Call Completion Task Force further investigate the call completion issue and better understand existing industry standards, please provide the following information. In particular, for each of the following, please identify whether any are addressed in existing ATIS guidelines (and, if so, identify the relevant guideline); whether new clarifying guidelines specific to today's IP and TDM interworking are planned; and when such guidelines might be available.

- *Excessive call setup delay*, which we define to include a delay before the called party hears ringing that is in excess of 8 seconds. We understand that one possible cause of excessive call setup delay appears to be a practice of continuing to sequentially search to find a low-cost path to the rural terminating carrier at the expense of providing acceptable service quality.
  - Does ATIS have or plan guidelines relating, for example, to limits on searching, or the speed with which intermediate providers should release the call back to a prior carrier in the call path when faced with apparent delays?
- *Call looping*, in which a call is handed over for completion to a provider that has previously handed off the call, may also be a cause of excessive call setup delay or setup failure.
  - Does ATIS have, or is ATIS planning, guidelines or recommended practices for detecting and avoiding looping situations?
- *False audible ringing*, in which the caller believes he has heard prolonged ringing before the called phone has actually been rung. This would seem to be a departure from the long-established telephony signaling practice – and caller expectation – of a ring back tone not being received before the terminating provider affirmatively signals that the called party is being alerted that there is an incoming call.
  - What guidelines or practices does ATIS recommend for ring tone generation and the handling of announcements from the terminating carrier? How does ATIS address the practice of an originating or intermediate provider triggering audible ringing to the caller before having been signaled by the terminating provider? Does ATIS recommend any practices for avoiding the caller experiencing dead air in lieu of false audible ringing?

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Industry Representatives to FCC Investigations and Hearing Division (June 13, 2011) (stating that “[s]tories abound of customers in rural areas who – only after they receive calls via other means (e.g., on a cell phone) or emails from friends, family, or business colleagues – find that those trying to reach them at home or in the office have been unable to do so because either the call never went through or it rang a dozen times without answer.”). Available at <https://prodnet.www.neca.org/publicationsdocs/wwpdf/061311callterm.pdf>

The Rural Call Completion Task Force appreciates ATIS's interest and cooperation to resolve this serious matter. We look forward to working with you to ensure the availability and reliability of voice service for all Americans, including customers in all rural and high-cost areas.

Sincerely,

Sharon Gillett  
Chief, Wireline Competition Bureau

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