

**STATEMENT OF
COMMISSIONER AJIT PAI**

Re: *Rural Call Completion*, WC Docket No. 13-39

The telephone network is built on a simple premise: You call a number, the phone rings, and you reach the person you are calling. The call could be local or long-distance, domestic or international. You may have to speak with an operator or pay a little extra. But in every case, the call goes through.

Or it should. Over the past three years, there has been an unusual spike in the number of calls placed to rural Americans that never reach them. A call is placed, but the phone never rings. Strange as it seems, it may now be easier to reach someone in the Alps than a cabin in Alpine, Arizona.

The reason is not clear.¹ If least-cost routing tables are not properly updated, for example, some calls may fall into a recursive loop and never be set up. Similarly, aging switches are still in the field, interconnected with modern equipment. These switches might fail when sent information they do not expect. And such problems could be made worse as calls sometimes bridge multiple networks with differing formats for call set-up and signaling. If technical issues like these are the cause of dropped calls, we should help the parties diagnose and cure them as swiftly as possible. Alternatively, if telephone providers are intentionally or knowingly blocking calls to rural areas, the Commission must investigate the responsible parties and hold them accountable.

I hope today's Notice of Proposed Rulemaking will help us figure out the root of the problem. To that end, our data will need to reflect the complete picture. I thus welcome the across-the-board approach the Notice takes in collecting data. It builds on and supplements the work already done by the FCC's Rural Call Completion Task Force. But I do want to make one thing clear: Although the Notice proposes to sunset the data collection about eight years from now, I hope we can do so much sooner. Rural call completion should not be a live issue eight years from now. We must resolve it much, much sooner.

Fortunately, the Commission is not alone. Hundreds of rural carriers and long-distance providers already are working together to troubleshoot issues. The Next Generation Interconnection Interoperability Forum of the Alliance for Telecommunications Industry Solutions has been coordinating efforts among carriers to identify and address technical bugs. State commissions have been actively involved as well, connecting customers and carriers and keeping our attention focused as well.

Consumers also are helping. Each time a consumer tells us about a call that did not go through, that's another data point to analyze. Each time a consumer complains to us, that's another opportunity for a rural carrier and a long-distance provider to solve the problem. Because consumer complaints likely represent only a small fraction of actual incidents, we should try to make it easier for consumers to reach us. One possibility is to create a specialized complaint form dedicated to call completion; the form that we currently use (Form 2000B) is really about billing, privacy, and service quality, not call completion.² That simple step might make it a little easier for consumers to report rural call completion matters and for the carriers to address them. And that, of course, is what this whole proceeding is all about.

My thanks go out to the staff in the Wireline Competition Bureau, Enforcement Bureau, and General Counsel's Office who have been studying rural call completion issues and put together this Notice, as well as the members of the Consumer and Governmental Affairs Bureau who have been fielding calls from the public. I look forward to collaborating with Chairman Genachowski and my fellow Commissioners to make sure all calls go through to rural America.

¹ For a thorough discussion of rural call completion issues, see Letter from Michael R. Romano, National Telecommunications Cooperative Association, *et al.*, to Theresa Z. Cavanaugh & Margaret Dailey, FCC (June 13, 2011), <https://prodnet.www.neca.org/publicationsdocs/wwpdf/061311callterm.pdf>.

² FCC, Form 2000B, <http://go.usa.gov/4PR3>; *see also* <http://go.usa.gov/4PRm> (adding a header to the Form 2000B).